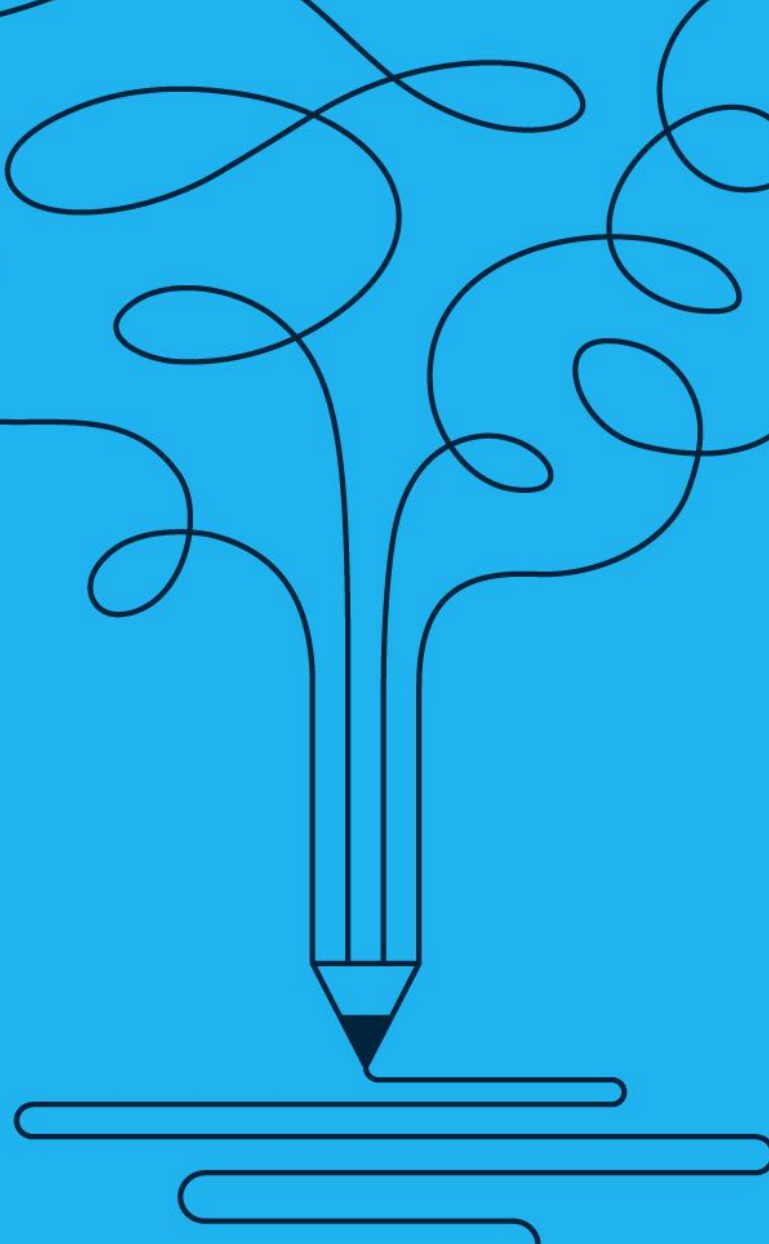




CCTV POLICY

AUTHOR	REVIEWED	NEXT REVIEW
B.MCALINDEN	SPRING 2025	SPRING 2027

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1. Introduction

1.1 Oulton Primary has in place closed circuit television (“CCTV”) systems to provide a safe and secure environment for pupils, students, staff and visitors, and to protect Oulton Primary School property.

1.2 This document sets out the accepted use and management of the CCTV system and images to ensure Oulton Primary School complies with the Data Protection Act 1998 (DPA), Human Rights Act 1998 (HRA) and other legislation.

1.3 Oulton Primary School has produced this policy in line with the Information Commissioner’s CCTV Code of Practice.

1.4 There are 16 fixed cameras located at Oulton Primary School. Live images from the system are on permanent view on the Reception Desk and Server Room. Recorded and live images from the cameras can be viewed by accessing the CCTV panels in these locations. Access to recorded images must be authorised by the Site Manager and/or Headteacher.

2. Purpose of CCTV

2.1 Oulton Primary School has installed CCTV systems to:

- Protect Oulton Primary School’s buildings and assets;
- Assist in the prevention and detection of crime;
- Assist in identifying, apprehending and prosecuting offenders;



- Assist in managing and running Oulton Primary School offices and its school sites; and

- Monitor the security of buildings.

2.2 The systems will be provided and operated in a way that is consistent with an individual's right to privacy.

2.3 The systems will not be used to:

- provide images to the world wide web;
- disclose to the media.

3. Owner

3.1 The CCTV system is owned and operated by Oulton Primary School.

3.2 The day-to-day management of the CCTV system is the responsibility of the Site Manager for Oulton Primary School.

3.3 The Site Manager for Oulton Primary School is responsible for regularly checking and confirming the efficiency of the system and in particular that the equipment is properly recording and that cameras are working.

4. Overview of system

- The CCTV system runs 24 hours a day, 7 days a week.
- The CCTV system is managed locally by the Site Manager for Oulton Primary School.
- CCTV cameras are located at strategic points, principally at the entrance and exit point of the building. All cameras will be prevented from focusing on the frontages or rear areas of private homes, gardens or other areas of private accommodation.
- The cameras are mounted such that no images can be obtained through windows of toilet areas.
- CCTV signs will be prominently placed at strategic points and at entrance and exit points of the sites to inform staff, pupils, students, visitors and members of the public that a CCTV installation is in use.
- Although every effort has been made to ensure maximum effectiveness of the CCTV system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.



5. Data Protection Act 2018 and GDPR

5.1 Oulton Primary School will treat the systems based on its sites, and all information, documents and recordings obtained and used, as data which are protected by the Act. Cameras will be used to monitor activities within Oulton Primary School's grounds to identify criminal activity occurring, anticipated, or perceived, and for securing the safety and wellbeing of Oulton Primary School employees, together with its visitors, and pupils.

5.2 For the purpose of the Data Protection Act 2018 and GDPR, Oulton Primary School is the Data Controller.

5.3 CCTV digital images, if they show a recognisable person, are personal data and are covered by the Data Protection Act 2018 and GDPR. This policy is associated with Oulton Primary School's Data Protection Policy, the provisions of which should be adhered to. The CCTV cameras must be administered and managed in accordance with the principles and objectives expressed in the Data Protection Policy and this CCTV Policy.

6. Access to images

6.1 Access to images will be restricted to those staff that need to have access in accordance with the purposes of the system. Access to the images is to be strictly limited. Routine viewing of recorded images is to be limited to:

- the Site Manager for Oulton Primary School
- The Headteacher or Designated School staff member.

6.2 When circumstances require, the Headteacher or Designated School staff member will have authority to allow other members of staff to view recorded images. Staff other than those listed above who view the recorded images will be recorded in a register. Viewing of images by the Police will also be recorded in the register.

6.3 Members of staff with responsibility for recorded images must ensure that images are only held for a maximum of 21 days and are then overwritten. This is done automatically by the system installed due to the limited amount of HDD space available.

6.4 Cameras will be pointed and focused on fixed points agreed in advance by the Headteacher.



6.5 Unless an immediate response to events is required, cameras must not be directed at an individual or a specific group of individuals. Covert surveillance is not to take place. Sound is not recorded by the system.

6.6 Disclosure of recorded material will only be made available to third parties in accordance with the purposes of the system and is limited to the following:

- Police and other law enforcement agencies where the images recorded could assist in a specific criminal enquiry and / or the prevention of terrorism and disorder;
- Prosecution agencies;
- Appropriate members of Oulton Primary School staff;
- Appropriate legal representatives; and
- People whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal enquiries).

6.7 All requests for the release of images should be referred to the Oulton Primary School's Headteacher. A record will be maintained of the release of images to the Police or other authorised applicants. Requests by the Police can only be actioned under Section 29 of the Data Protection Act 1998.

6.8 Should images be required as evidence, a copy may be released to the Police under their evidence guidelines. Images will only be released to the Police on the clear understanding that the image remains the property of Oulton Primary School, and both the images and associated information are to be treated in accordance with this policy. Oulton Primary School also retains the right to refuse permission for the Police to pass the images to any other person.

6.9 Applications received from outside bodies (e.g. solicitors) to view or release images will be referred to the Headteacher for Oulton Primary School. In these circumstances images will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request or in response to a court order. A fee may be charged in such circumstances.

7. Individual access rights

7.1 Data Protection Act 2018 and GDPR gives individuals the right to access personal information about themselves, including CCTV images.

7.2 All requests for access to a copy of CCTV footage by individuals should be made in writing to Oulton Primary School's Headteacher.



7.3 Requests for access to CCTV images must include:-

- The date and time the images were recorded;
- Information to identify the individual, if necessary;
- The location of the CCTV camera; and
- Proof of Identity.

7.4 If Oulton Primary School cannot comply with the request, the reasons will be documented.

7.5 The requester will be advised of these in writing, where possible.

8. Retention and disposal

8.1 Unless required for evidential purposes or the investigation of crime or otherwise required by law, recorded images will be retained for no longer than 21 days from the date of recording on the HDD.

8.2 At the end of their useful life all images on discs will be erased and securely disposed of as confidential waste. All still photographs and hard copy prints also will be securely disposed of as confidential waste.

9. Maintenance and review

9.1 This Policy will be reviewed annually or when there are changes to relevant legislation.

10. Breaches of the Policy (including breaches of security)

10.1 Any breach of the Policy by Oulton Primary School staff will be investigated in accordance with the Oulton Primary School disciplinary policy.

11. Complaints

11.1 Any complaints about the CCTV system will be dealt with in accordance with the Oulton Primary School complaints policy. This can be found on the Oulton Primary School website.

