



Sheffield Lower School

CCTV Policy

Written by	Reviewed & Ratified by Governors	Shared with Staff	Last Updated	Review cycle	Next Review Due
Victoria Joyce Business Manager	November 2024	November 2024	November 2024	Annual	November 2025

1. Aims and objectives

The purpose of this policy is to regulate the management, operation and use of Closed Circuit Television and its associated technology at Sheffield Lower School.

CCTV systems are installed for the purpose of enhancing security of the building and its associated equipment as well as creating reassurance among the occupants at any one time that a surveillance security system is in operation 24 hours per day.

CCTV surveillance at the School is intended for the purposes of:

- protecting the school buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, students and visitors;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting law enforcement agencies in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and assisting in the management of the school
- function for number plate recognition as part of the school's gate entry system

2. Legislation

This policy takes account of all applicable legislation and guidance including:

- General Data Protection Regulation (GDPR)
- Data Protection Act 2018 (together the Data Protection Legislation) as amended by the UK General Data Protection Act 2021
- CCTV Code of Practice produced by the Information Commissioner

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy.

Information obtained through the CCTV system may only be released when authorised by the Headteacher or Deputy Headteacher. Any requests for CCTV recordings/images from law enforcement agencies will be fully recorded and legal advice will be sought if any such request is made.

3. Location of Cameras

All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, students and visitors.

Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The school will make sure all reasonable efforts are made to ensure that areas outside of the school premises and grounds are not recorded.

Signs will be erected to inform individuals that CCTV is in operation.

4. Management and Retention

The CCTV system will be led by a member of the Senior Leadership Team. Key staff, including the Site Manager, Headteacher and Deputy Headteachers, have been provided with the necessary induction in the use of the CCTV systems and only those members of staff have access to the recordings within the system.

Recorded images which are stored by the CCTV system will be restricted to access by authorised personnel listed above. No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.

5. Storage and Retention of Images

Recorded images are stored only for a period of up to 31 days unless there is a specific purpose for which they are retained for a longer period. The school will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

- CCTV recording systems being located in restricted access areas only the identified staff now have access rights,
- The CCTV system access only permitted to SLT and the day-to-day operators
- Restriction of the ability to make copies to specified members of staff
- Images can be kept for that academic year and only retained if there is a criminal investigation.
- Vehicle registration details utilised for the Access system are not stored within the access database, however footage containing their images may be retained for up to 31 days.
- Secure deletion of all recorded data.

6. Disclosure of Images

Any individual who requests access to images of themselves will be considered to have made a subject access request. Such a request should be considered in the context of the Subject Access Request Policy. If the footage contains only the individual making the request, then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request.

If the footage contains images of other individuals then the school must consider whether:

- The other individuals in the footage have consented to the disclosure of the images. A record of any consent must be kept and held securely,
- Records of all disclosures must be kept and held securely. The records should set out:
 - When the request was made;
 - Who processed the request
 - The process followed in determining whether the images contained third parties;
 - The individuals that were permitted to view the images and when; and
 - Whether a copy of the images was provided, and if so to whom, when and in what format.

The school will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation. CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

If a request is received from a law enforcement agency for disclosure of CCTV images then the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any individuals of concern. This will then enable proper consideration to be given to whether this is a valid request and not a fishing expedition, where it is a valid request what should then be disclosed and the potential disclosure of any third-party images.

7. Misuse of CCTV system

The misuse of CCTV system could constitute a criminal offence. Any member of staff who breaches this policy may be subject to disciplinary action.

8. Complaints

Any complaints relating to this policy or to the CCTV system operated by the school should be made in accordance with the Schools Complaints Policy.