



Making the most of everyone.

CCTV Policy and Procedure

Policy Adopted February 2024

Policy Valid until February 2026

Signed:

(Chair of Governors)

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1. Policy Statement

Ysgol Penmorfa uses CCTV surveillance systems within its premises. This policy provides information about the CCTV systems used and our position as to its management, operation and use.

The policy applies to all members of staff, pupils and visitors to Penmorfa and any other persons whose images may be captured on the CCTV system.

CCTV is used for the purpose of providing a safe and secure environment and to protect school buildings and assets. CCTV operation is subject to the procedures set out in this policy and takes account of all applicable legislation and guidance, including:

- General Data Protection Regulation (“GDPR”)
- Data Protection Act 2018
- Protection of Freedoms Act 2012
- Human Rights Act 1998
- Surveillance Camera Code of Practice (issued by the UK Home Office)

‘**CCTV**’ refers to any type of camera used for the purpose of surveillance within this policy.

2. CCTV System Overview

- a. The CCTV system is owned and managed by the school. The school is the ‘data controller’ for the images produced by the CCTV system and is registered with the Information Commissioner’s Office. The Head Teacher is responsible for the overall management and operation of the CCTV system in accordance with the principles expressed in this policy.
- b. CCTV operation is subject to a Data Protection Impact Assessment (DPIA) to assess the impact on individuals’ privacy and ensure compliance with relevant legislation.
- c. Signs shall be placed at main entrances to inform individuals that CCTV is in operation. The signage shall indicate who the system is managed by and includes a point of contact for further information. Signs shall also be erected where cameras are sited to inform individuals they are within an area in which CCTV is in operation.

- d. The CCTV is in operation 24 hours a day, every day. During periods of school closure, the site manager has access to live and recorded images]. Live images from CCTV cameras are streamed to a monitoring station within the school.
- e. The CCTV system, images and information shall be subject to appropriate security measures to safeguard against unauthorised access and use.
- f. The headteacher is appointed to act as Single Point of Contact for matters relating to the school's CCTV system. The Single Point of Contact shall also ensure that the school maintains appropriate records and documentation including:
 - CCTV Policy & Procedures
 - Data Protection Impact Assessment (DPIA)
 - CCTV Asset list
 - Record of persons authorised to access CCTV systems
 - Cyber/Security measures in place to protect data
 - Records of training undertaken by staff with access to or operating CCTV
 - Annual review of CCTV use

The governing body may wish to receive an annual report of the system's performance and priorities including a brief overview of security checks and measures, compliments and complaints, disclosure requests etc.

- g. Where the school is engaged in contract with a third party for the supply of CCTV operating services, the school shall ensure that relevant [Security Industry Authority \(SIA\) licensing requirements](#) are met. CCTV owned by the school, operated by its own staff and whose data is controlled by the school is classed as in-house and does not fall under SIA legislation.

3. Purpose

The school shall only use CCTV where it is necessary for specified and legitimate purposes:

- To provide a safe and secure environment for pupils, staff and visitors
- To protect school building and their assets
- To help prevent, detect and investigate crime

Footage may also be used as evidence during disciplinary, grievance and complaint

procedures.

4. Position of Cameras

- a. Cameras shall be sited in such a way as to meet the purposes for which the CCTV is operated and shall be in prominent positions where they are clearly visible to pupils, staff and visitors. Areas in which CCTV is in operation are set out in Appendix 1.
- b. Cameras shall usually be sited in communal areas such as corridors or entrances. Cameras shall 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.
- c. Where there is a heightened expectation of privacy, such as personal cellular offices, changing rooms or toilets, the school shall consult with the Data Protection Officer (DPO) with a view to consultation and completion of a specific Data Protection Impact Assessment (DPIA) in respect of siting cameras in these areas
- d. Cameras capturing footage inside toilet cubicles or directed towards urinals shall not be permitted under this policy.

5. Monitoring & Access

- a. Viewing of live CCTV images shall be restricted to authorised staff for the purposes stated in this policy.
- b. Access to recorded images which are stored on the CCTV system shall be restricted to Site Manager and SLT for the purposes stated in this policy and for law enforcement purposes. Other school staff may view recorded footage on the direction of the Head/Deputy.
- c. Recorded images may be disclosed to Governors as part of an internal disciplinary proceeding, grievance procedure or complaint.
- d. The school shall maintain a log all individuals accessing recorded CCTV images, including time and dates of access.

- e. Unless an immediate response to events is required, staff should not direct cameras at an individual or a group of individuals.
- f. Where covert surveillance is planned, authorisation must be sought and granted by an Authorising Officer of Denbighshire County Council in accordance with the Regulation of Investigatory Powers Act 2000 prior to commencement. If there is any doubt on the procedure guidance must be sought from the Council's Monitoring Officer/Head of Legal, HR and Democratic Services. Covert surveillance carried out by school staff without a form of authority from the Magistrates Courts may be subject to disciplinary action.

6. Storage & Retention

- a. Any images recorded by the CCTV system shall be retained only for as long as is necessary for the purpose for which they were originally recorded.
- b. Recorded images are stored for a period of 30 days unless there is a specific purpose for which they are retained for a longer period. Images shall be automatically or manually deleted after this period.
- c. Where it is necessary for a specific purpose to retain images for a longer period, this shall be subject to regular review.
- d. The school shall ensure appropriate security measures are in place to safeguard against unauthorised access to recorded images including:
 - Restricting access to recording systems and retained images to authorised members of staff
 - Restricting access to recording systems by appropriate security measures such as password protection
 - The use of encryption for exported recordings.

7. Disclosure of images

- a. Individuals captured on CCTV are 'data subjects' and can request access to CCTV

images of themselves.

- b. Where an individual requests access to images of themselves, the request should be submitted on the standard form in Appendix 2. The school should respond within 1 month.
- c. When such a request is made a specified staff member shall review the CCTV footage, in respect of relevant time periods and in accordance with the request.
- d. If the footage contains only the individual making the request, then the individual may be permitted to view the footage.
- e. Where footage contains images of other individuals, advice should be sought from the Data Protection Officer and the school must consider:
 - Whether the request *requires* the disclosure of others or can the images can be distorted so as not to identify them
 - Whether the other individuals have consented to the disclosure of the images,
 - Where consent is not sought or obtained, whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
- f. A log must be kept of all disclosures.

8. Disclosure of Images to Third Parties

- a. The school shall only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with this policy and the law. A record shall be kept of all such release of records.
- b. Police and law enforcement agencies may request access to personal data including recorded images for the following purposes:
 - The prevention or detection of crime
 - The apprehension or prosecution of offenders
 - The assessment of collection of any tax or duty
- c. The date, time, location, and incident for which CCTV recordings are requested should be specified on a Disclosure Request Form signed by an officer of the rank of inspector

or above.

- d. The Data Protection Act does not give an automatic right of access to information. The school should assess the merit of each request received.
- e. Should a record be required as evidence, a copy may be released to the police under the procedures described in this policy.
- f. Records shall only be released to the police on the clear understanding that the record remains the property of the school, and both the record and information are to be treated in accordance with this policy.
- g. The school also retains the right to refuse permission for the police to pass on the record or any part of the information contained therein to any other person unless a court order ordering disclosure is sought. The Police may require the school to retain the stored records for possible use as evidence in the future.
- h. If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

9. Misuse of CCTV systems and recordings

CCTV images constitute personal data and appropriate data protection training shall be provided to staff who have access to live and recorded footage. The misuse of CCTV system and images could constitute a criminal offence. Any member of staff who breaches this policy may be subject to disciplinary action.

10. Review of CCTV

The use of CCTV and the Data Protection Impact Assessment (DPIA) relating to it shall be regularly reviewed to ensure its operation remains necessary and proportionate in

meeting its stated purposes.

Complaints / Key Contact Points

Subject Access Requests for disclosure of CCTV images should be made by contacting Ysgol Penmorfa, Dawson Drive, Penmorfa. LL19 8SY

If you have a concern or complaint in relation to this policy or about the way we are collecting or using your personal data, you should raise your concern with the school or the Data Protection Officer for Schools in the first instance. You can also contact the [Information Commissioner's Office](#)

Key Contact details:

Schools Data Protection Officer

Lisa Jones, Legal Services Manager
Legal, HR and Democratic Services, Denbighshire County Council County Hall, Ruthin,
Denbighshire. LL15 1YN
Tel: 01824 706275
dataprotection@denbighshire.gov.uk

Information Commissioner

Wycliffe
HouseWater
Lane
Wilmslow
Cheshire
SK9 5AF
Tel 03031231113
<https://ico.org.uk>

For further information about the Surveillance Camera Code of Practice:

[Biometrics and Surveillance Camera Commissioner](#)
scc@sccommissioner.gov.uk

The Commissioner has no powers to inspect or audit CCTV systems, or investigate any complaints

Appendix 1

CCTV locations

Camera	Area monitored
1	
2	
3	
4	

UK Data Protection Act 2018 (General Data Protection Regulations – GDPR). RIGHT OF SUBJECT ACCESS APPLICATION FORM.

PLEASE NOTE THAT THIS FORM IS ALSO AVAILABLE IN WELSH.

Your Rights:

Under the terms of the UK Data Protection Act 2018 (GDPR) an individual has a right to access personal data which the School holds about him/her, subject to any exemptions that may apply.

Before information can be searched for and sent to you, your identity must be established. This is to ensure that not only do you receive the correct data but that other individuals cannot fraudulently obtain your data.

The UK Data Protection Act 2018 allows us one month in which to respond to your request. However, this period cannot start until we have all the information necessary to process the request.

This form is not obligatory but it would assist us if you would complete it and help us deal more quickly with your request.

If you would like to pursue your access rights, please answer the following questions:

SECTION 1 – Your Personal Details

This Section is for requesting your own personal information. Please complete Section 4 below if you are acting on another's behalf.

The information requested below is to help the School satisfy itself as to your identity and to find any data held about you. **Please use block capital letters.**

Title (Tick box if appropriate)	Mr		Mrs		Miss		Ms	
Other title (e.g. Dr, Rev, etc.)								
Surname/Family Name								
First Names								
Maiden/Former Names								
Sex (tick box)	Male		Female					
Date of Birth								
Email address								
Home Address								
Post Code					Tel No			

If you have lived at this address for less than two years, please also give your previous address:

Previous Home address	
Post Code	

Have you previously applied to the School for access to your personal data?

Yes ☐ No ☐

If so, please could you give the date of your application?

Proof of Identity

To help establish your identity, your application should be accompanied by copies of two of the following documents: -

- Utilities Bill ☐
- Driving Licence ☐
- Passport ☐

Please do not send original documents, only copies, as these will not be returned.

SECTION 2 – The information you are requesting

If your request is for paper and electronic records and there is a specific item of personal information/data which you are seeking, please give the details below:

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If your request is for CCTV footage, please provide the following information:

Date	
Time	
Location	
Description of Incident, Vehicles and Person (s)	

SECTION 3 – Requesting another person’s data

An application being made by someone acting on behalf of the data subject.

I confirm that I am acting on behalf of the data subject, namely and I enclose herewith proof of my authority to act on behalf of the data subject (for example, a letter signed by the data subject authorising me, Power of Attorney, etc.).

Your relationship to the Data Subject		
Title (e.g. Mr)		
Surnames/Family Name		
First Name		
Home / Business address		
	Post Code	Tel No
Email address		

Proof of Identity

Proof of identity of agent to help establish your identity as the authorised agent. The application should be accompanied by copies of two of the following documents:

- Utilities Bill ☐
- Driving Licence ☐
- Passport ☐
- Evidence of parental responsibility (if applicable) ☐

Please do not send original documents, only copies.

SECTION 4 - Declaration

I request that you provide me with details of the personal data about me as I have indicated above.

I confirm that I am the data subject - I am asking for my own personal data.

OR

I confirm that I am acting on behalf of the data subject – I am asking for the personal data of someone else.

Signed Date

Checklist

- 1 Have you filled in all of the parts of the application form relevant to your application?
- 2 Have you signed the form?
- 3 Have you enclosed identifying documents?
- 4 Where you are acting on behalf of the data subject have you enclosed proof of your authority to do so and completed Section 4?

Privacy Notice – what we will do with your details.

Your documents (the Subject Access Request form, the identifying documents, and any associated correspondence) will be processed by the School for the specific purposes of processing your Subject Access Request under the Data Protection Act 2018. The School will not share the data with any other organisation unless required by law. The School may need to share your data with the Information Commissioner's Office in the event of a complaint or with Denbighshire County Council under any service level agreements, as many Schools receive advice and support from the local authority.

The School will retain the documents for two years from the completion of the request.

If you feel that the School have mishandled your personal data at any time you can make a complaint to the Information Commissioners Office by visiting their website, or by calling their helpline on 0303 123 1113.