



## **CCTV Policy**

Senior Leader responsible	Headteacher
Date approved by LGB	18/07/2024
Next review date	Summer 2025

## 1. Overview

- 1.1 Dereham Neatherd High School has in place a CCTV surveillance system, "the system," within the grounds of the school both external and internal. Images are monitored and recorded centrally and will be used in strict accordance with this policy. The system is owned by Dereham Neatherd High School.
- 1.2 The Headteacher has initial responsibility for the operation of the system and for ensuring compliance with this policy and the procedures documented.

**General Data Protection Regulations:** CCTV digital images, if they show a recognisable person, are personal data and are covered by the General Data Protection Regulations. This Policy is associated with the Trust's Data Protection Policy, the provisions of which should be adhered to at all times.

## 2. The system

- 2.1 The system comprises of fixed position cameras; monitors; digital recorders; and public information signs.
- 2.2 Cameras are located at strategic points on the complex and no camera will be hidden from view. A list of locations is given at Appendix 1.
- 2.3 Signs will be prominently placed at strategic points and at entrance and exit points of the complex to inform staff, visitors, and members of the public that a CCTV installation is in use.
- 2.4 Although every effort has been made to ensure maximum effectiveness of the system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

### **3. Purpose of the system**

**In addition to this policy, please refer to the School's Behaviour Policy**

3.1 The system has been installed with the primary purpose of reducing the threat of crime generally, protecting the school's premises and helping to ensure the safety of all pupils, staff and visitors consistent with respect for the individuals' privacy. These purposes will be achieved by monitoring the system to:

- protect the school buildings and school assets, both during and after school hours;
- promote the health and safety of staff, pupils and visitors as well as for monitoring student behaviour;
- prevent bullying;
- reduce the incidents of crime and anti-social behaviour (including theft and vandalism);
- support the police in a bid to deter and detect crime;
- assist in identifying, apprehending and prosecuting offenders;
- ensure that the school rules and the Behaviour Policy are respected so that the school can be properly managed;
- facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against staff and assist in providing evidence to managers and/or to a member of staff against whom disciplinary or other action is, or may be, taken;
- in the case of staff, to provide management information relating to employee compliance with contracts of employment.

The system will not be used:

- To provide recorded images for the world-wide-web
- For any automated decision taking.

### **4. Monitoring of images**

4.1 Images captured by the system will be recorded in the site office, twenty-four hours a day throughout the whole year. Monitors are sited in the site office. These are also linked to TV screens in the Headteacher and Deputy Headteacher's offices for the purposes of live viewing (but not recording). None of the aforementioned devices are visible from outside these rooms.

4.2 No unauthorised access to the site office, Headteacher's office and/or Deputy Headteacher's office will be permitted at any time. Access will be strictly limited to IT,

Site Team, Senior Members of staff, Student Development Team, police officers and any other person with statutory powers of entry.

- 4.3 In an emergency and where it is not reasonably practicable to secure prior authorisation, access may be granted to persons with a legitimate reason to enter the server room.

## **5. Staff**

- 5.1 All staff working with the CCTV system will be made aware of the sensitivity of handling CCTV images and recordings. The Privacy Officer will ensure that all staff are fully briefed and trained in respect of the functions, operational and administrative, arising from the use of CCTV.
- 5.2 Training in the requirements of the General Data Protection Regulations will be given to all those required to work with the CCTV system by the Privacy Officer.

## **6. Recording**

- 6.1 Digital recordings are made in the site office using digital video recorders operating in real time.
- 6.2 Images will normally be retained for one week from the date of recording, and then automatically overwritten and the log updated accordingly. Once a hard drive has reached the end of its use, it will be erased prior to disposal and the log will be updated accordingly.
- 6.3 All hard drives and recorders shall remain the property of Dereham Neatherd High School until disposal and destruction.

## **7. Access to images**

- 7.1 Access to images will be strictly restricted to those staff needing to have access in accordance with the purposes of the system.

## 7.2 Access to images by third parties:

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

- Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder
- Prosecution agencies
- Relevant legal representatives
- Exclusions Panels
- The media where the assistance of the general public is required in the identification of a victim of crime or the identification of a perpetrator of a crime
- People whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings
- Emergency services in connection with the investigation of an accident.

## 7.3 Access to images by a subject:

CCTV digital images, if they show a recognisable person, are personal data and are covered by the General Data Protection Regulations. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Regulations. They do not have the right of instant access.

7.3.1 A person whose image has been recorded and retained and who wishes access to the data must apply in writing to the school's Privacy Officer. Subject Access Request Forms are obtainable in hard copy at the main office. An electronic copy can be obtained via email [office@neatherd.org](mailto:office@neatherd.org). A response will be provided promptly and in any event within 1 month of receiving the request.

7.3.2 The General Data Protection Act gives the Privacy Officer the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.

7.3.3 If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing within 1 month, stating the reasons.

## 8. **Complaints**

8.1 It is recognised that some Data Subjects may have concerns or complaints about the operation of the system. Any complaint should follow the school's complaint procedure which can be found on the school's website

<https://neatherd.org/Information/Key-Information/>. Concerns or enquiries relating to the provisions of the General Data Protection Regulations and/or The Data Protection Act 2018 may be addressed to the Privacy Officer. These rights do not alter the existing rights of anyone under any relevant grievance or disciplinary procedures.

## **9. Data breach**

- 9.1 A “Personal Data Breach’ means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.”
- 9.2 In the event that a data breach occurs, a thorough assessment of the breach will be made immediately by the Privacy Officer.
- 9.3 Immediate steps will be taken to ensure that the breach is contained, and the effects of the breach minimised and mitigated as much as possible.
- 9.4 If the data breach is deemed to be reportable to the Information Commissioner’s Office, the ICO will be notified within 72 hours of the discovery of the breach. The ICO can be informed via their website at: <https://ico.org.uk/for-organisations/report-a-breach/> or by telephone: 0303 123 1113
- 9.5 In the case of a serious breach, Data Subjects whose data has been affected will be notified, in writing.

## **10. Compliance monitoring**

- 10.1 The contact point for staff or members of the public wishing to enquire about the system will be the Privacy Officer by pre-arranged appointment.
- 10.2 Upon request enquirers will be provided with:
- A summary of this statement of policy
  - An access request form if required or requested
  - A subject access request form if required or requested
  - A copy of the school’s complaints procedures

- 10.3 All documented procedures will be kept under review and a report periodically made to senior management.
  
- 10.4 The effectiveness of the system in meeting its purposes will be kept under review and reports submitted as required to senior management.

**Appendix 1 Camera Locations**

Camera No.	Internal or External	Location
1 D1	INT	Outside entrance to Yr10/11 boy's toilets
2 D2	EXT	Outside entrance to Yr10/11 girl's toilets
3 D3	EXT	Canopy
4 D4	EXT	S/HALL CAR PARK
5 D5	EXT	DT5
6 D6	INT	Maths 5
7 D7	INT	Outside entrance to Yr8/9 toilets
8 D8	EXT	Courtyard
9 D9	EXT	Courtyard Gate
10 D10	-----	IP CAM 10
11 D11	EXT	New block entrance
12 D12	EXT	Back gate
13 D13	EXT	3G PITCH
14 D14	EXT	CP2
15 D15	EXT	S/HALL CP
16 D16	EXT	HUMMANITIES GATE
17 D17	EXT	TENNIS COURT GATE
18 D18	EXT	Bike sheds
19 D19	EXT	CANOPY 2
20 D20	EXT	ENG FIELD
21 D21	EXT	CANTEEN LH WALL
22 D22	EXT	S/HALL MATHS
23 D23	EXT	English foyer
24 D24	EXT	Mobile
25 D25	EXT	SC7 FIELD
26 D26	EXT	SRB 3G
27 D27	INT	CANTEEN
28 D28	INT	Outside Yr6/7 toilets
29 D29	EXT	CP3
30 D30	EXT	CP1
31 D31	EXT	New SRB