



Maidstone & Malling Alternative Provision

INSPIRING ACHIEVEMENT THROUGH INCLUSION AND SUPPORT

Believe, Achieve, Exceed

CCTV Policy

February 2021

Contents

1. Background	3
2. Justification of Use of CCTV	3
3. Data Protection Impact Assessment	4
4. Locations of Cameras	4
5. Notification	5
6. Storage and Retention	5
7. Access	5
8. Subject Access Requests	6
9. Complaints	7
10. Staff Training	7
Appendix 1	8

1. Background

1.1 The Maidstone and Malling Alternative, hereafter referred to as 'the school', uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and monitor the school building in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.

1.2 CCTV surveillance at the school is intended for the purposes of:

- Protecting the school building and school assets, both during and after school hours
- Promoting the health and safety of staff, pupils and visitors
- Preventing bullying
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
- Supporting the Police in a bid to deter and detect crime
- Assisting in identifying, apprehending and prosecuting offenders; and ensuring that the school rules are respected so that the school can be properly managed

1.3 The system consists of 32 fixed cameras.

1.4 CCTV cameras are not located in sensitive areas.

1.5 The CCTV system is owned and operated by the school and the deployment of which is determined by the school's leadership team.

1.6 The CCTV is monitored centrally from a restricted area. Remote access has not been set-up.

1.7 The restricted area is secured both during and after school hours with access strictly limited to the System manager and Headteacher.

1.8 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 e.g. CCTV will not be used for monitoring staff performance.

2. Justification of Use of CCTV

2.1 The use of CCTV to control the perimeter of the school building for security purposes has been deemed to be justified by the leadership team and the management committee. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation or of anti-social behaviour.

2.2 CCTV systems will not be used to monitor teacher performance.

3. Data Protection Impact Assessment

3.1 Where new CCTV systems or cameras are to be installed, the school will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This may involve the need for consultation with staff, parents and local residents.

3.2 Where existing CCTV systems are in operation as of May 2018, the school will endeavour to carry out a full Data Protection Impact Assessment on any upgrade or replacement of the system or within a 3 year period from the date of the implementation of GDPR, whichever is sooner.

4. Locations of Cameras

4.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated.

4.2 The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. The school will make every effort to position cameras so that their coverage is restricted to the school premises; which may include outdoor areas.

4.3 Internal CCTV cameras are currently located in all classrooms, corridors, the foyer, reception areas and offices.

4.4 External CCTV cameras are positioned as to capture the outside play areas, front car park, rear car park and the front gate.

4.5 All cameras are positioned in such ways to prevent or minimise recordings of passers-by or of another person's private property.

4.6 CCTV video monitoring and recording of public areas may include the following:

- Protection of school building and property
 - The building's perimeter, entrances and exits, foyers and corridors, classrooms, office locations and areas of receiving goods and services
- Monitoring of access control systems
 - Monitor and record restricted access areas at entrances to the building and other areas
- Verification of security alarms
 - Intrusion alarms, exits door controls and external alarms
- Police criminal investigation
 - Robbery, burglary and theft surveillance.

5. Notification

5.1 A copy of this CCTV policy will be provided on request to staff, pupils, parents and visitors to the school and will be made available on the school website.

5.2 Signage to indicate that CCTV is in operation will be located throughout the school.

5.3 Signage will be predominately displayed at the entrance of the school. The signage will indicate CCTV operation is in operation every day of the year.

5.4 Other locations of CCTV signage are located in the corridors.

6. Storage and Retention

6.1 The images captured by the CCTV system will be retained for a maximum of 25 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

6.2 The images/recordings will be stored in a secure location with limited access.

6.3 Access will be strictly limited to authorised personnel. Supervising access and maintenance of the CCTV system is the responsibility of the System manager.

6.4 In certain circumstances, the recordings captured may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are viewed, access will be limited to authorised individuals on a need-to-know basis.

6.5 Extracted recordings will be stored in a secure area of the network with limited access to only authorised personnel.

7. Access

7.1 The monitoring equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel.

7.2 Access to the CCTV system and stored images will be restricted to authorised personnel only.

7.3 A log of access, appendix 1, will be kept electronically in the restricted area and will be completed when accessing images.

7.4 A record of the date and any disclosure request along with details of who the information has been provided to (name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

7.5 Data will be provided when requests are authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

7.6 In relevant circumstances, CCTV footage may be accessed:

- By the police: where the school, or its agents, are required by law to make a report regarding the commission of a suspected crime
- Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on the school's property
- To the HSE and/or any other statutory body charged with child safeguarding
- To assist the Headteacher/SLT and or the safeguarding team in establishing facts in cases of unacceptable pupil behaviour, which in case, the parents/guardians will be informed
- To data subjects or those who represent the data subject pursuant to a Subject Access Request
- To individuals, or their representatives, subjected to a court order
- To the school insurance company where the insurance company requires same in order to pursue a claim for damage done to insured property.

8. Subject Access Requests

8.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

8.2 Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, data, time and location.

8.3 The school will respond to requests within 30 school days of receiving the request in line with the school's right of access policy.

8.4 The school reserves the right to deny access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

8.5 A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

9. Complaints

9.1 Complaints and enquiries about the operation of CCTV within the school should be dealt with in conjunction with the school's complaint policy.

10. Staff Training

10.1 Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.

10.2 Staff misuse of surveillance system information will lead to disciplinary proceedings.

Appendix 1

CCTV Access Log

All authorised staff looking at CCTV must complete this form.

(The first entry is an example of how the log must be completed.)

SURNAME	FORENAME	DATE	TIME	REASON	RETAINED	REASON
SURNAME	Forename	01/02/2021	14:00 pm	Pupil A was reported to be smoking inside the school building. CCTV footage confirmed report.	Yes	Evidence to be used in meeting with parents.