

Moorland School CCTV Policy

MOORLAND



Approved by:
Mr Harrison

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1. Aims

This policy aims to set out Moorland school's approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on school property.

The purpose of this policy is to regulate the management, operation, and use of the closed-circuit television (CCTV) system at Moorland Private School. The system comprises a number of cameras located both inside and outside of various school, maintenance, and nursery buildings. All cameras can be monitored and viewed by authorised SLT and SMT Management within strictly designated confidential and locked management offices.

For example, Nursery Cameras, can be viewed by Mrs Harrison, Proprietor and Mrs Hayley Mossdrop Nursery Manager within the nursery office. Cameras within the Willows and external to this building only can be viewed by Miss McKeown and or SLT from her Office.

This Code follows Data Protection Act and GDPR guidelines. The Code of Practice will be subject to review to include consultation as appropriate with interested parties. The CCTV system is owned and operated by the school only. Therefore, no outside body can view the system.

A copy of this CCTV Policy will be provided to all staff and will be available upon request to our parents, families, and visitors.

1.1 Statement of intent

The purpose of the CCTV system at Moorland Private School is to:

1. Make all members of the Moorland School community feel protected and supported.
2. Support leadership and management, especially the DSL in relation to safeguarding and welfare concerns.
3. Support CPD and non-intrusive lesson observations.
4. Deter poor pupil behaviour or instances of peer-on-peer bullying.
5. Reduce silly acts of deliberate vandalism in the school
6. Determine the cause of accidents
7. Provide clarity, whilst assisting in the effective resolution of any misunderstandings.
8. Support any inspection or regulator(s) concerns or queries.

9. Assist in the defense of any litigation proceedings
10. Increase parental confidence.

The CCTV system at Moorland Private School **will not be** used/installed:

1. In any bathroom or changing areas, including dorms and dormitory corridors.
2. Regularly to monitor pupils and teaching staff.
3. Encroach on an individual's right to privacy.
4. Used to report petty matters, or in breach of our warm family ethos.
5. Pursue any other purposes than the ones stated above.

The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

The CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The system complies with the requirements of the Data Protection Act 2018 and UK GDPR.

Footage or any information gleaned through the CCTV system will never be used for commercial purposes.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by Moorland including Equality & Diversity Policy, Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other educational and related legislation. This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

2. Relevant legislation and guidance

This policy is based on:

2.1 Legislation

1. [UK General Data Protection Regulation](#)
2. [Data Protection Act 2018](#)
3. [Human Rights Act 1998](#)
4. [European Convention on Human Rights](#)
5. [The Regulation of Investigatory Powers Act 2000](#)
6. [The Protection of Freedoms Act 2012](#)
7. [The Freedom of Information Act 2000](#)
8. [The Education \(Pupil Information\) \(England\) Regulations 2005 \(as amended in 2016\)](#)
9. [The Freedom of Information and Data Protection \(Appropriate Limit and Fees\) Regulations 2004](#)
10. [The School Standards and Framework Act 1998](#)
11. [The Children Act 1989](#)
12. [The Children Act 2004](#)
13. [The Equality Act 2010](#)

2.2 Guidance

1. [Surveillance Camera Code of Practice \(2021\)](#)

3. Definitions

Surveillance: the act of watching a person or a place

CCTV: closed circuit television; video cameras used for surveillance

Covert surveillance: operation of cameras in a place where people have not been made aware they are under surveillance

4. Covert surveillance

Covert surveillance is not something we would use without good reason. At Moorland Private School it will only be used in extreme circumstances, such as where there is suspicion of a criminal or safeguarding offence. If the situation arises where covert surveillance is needed (such as following police advice for the prevention or detection of crime or where there is a risk to public safety), a data protection impact assessment will be completed in order to comply with data protection law.

5. Location of the cameras

Cameras are located in places that require monitoring in order to achieve the aims of the CCTV system (stated in section 1.1).

Cameras are located in:

1. The nursery buildings/rooms
2. The entrance of The Willows Building,
3. The office in The Willows.
4. The hallways in The Willows.
5. The classrooms in The Willows.
6. Externally around The Willows.
7. Please note that additional cameras will be added within the senior school at a later date.

All children and employees have been notified about the cameras and their locations. Both groups of people know the intent of the CCTV system we have at Moorlands and signage will be in place.

Cameras are positioned in order to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

Cameras at Moorland School are not in any place in which a child will get changed or go to the bathroom. All privacy is respected, and all guidance is adhered to.

6. Roles and responsibilities

6.1 The SLT Team

The Senior Leadership Team has the ultimate responsibility for ensuring the CCTV system is operated within the parameters of this policy and that the relevant legislation (defined in section 2.1) is complied with.

6.2 The Headteacher

The Headteacher will:

1. Liaise with the data protection officer (DPO) to ensure that the use of the CCTV system is in accordance with the stated aims and that its use is needed and justified
2. Ensure that the guidance set out in this policy is followed by all staff
3. Review the CCTV policy to check that the school is compliant with legislation
4. Ensure all persons with authorisation to access the CCTV system and footage have received proper training from the DPO in the use of the system and in data protection
5. Sign off on any expansion or upgrading to the CCTV system, after having taken advice from the SLT and taken the result of a data protection impact assessment
6. Decide, in consultation with the SLT, whether to comply with disclosure of footage requests from third parties.

6.3 The data protection officer.

The data protection officer (DPO) will:

1. Ensure that persons with authorisation to access the CCTV system and footage receive appropriate training in the use of the system and in data protection
2. Ensure that all staff are trained to recognise a subject access request
3. Deal with subject access requests in line with the Freedom of Information Act (2000)
4. Monitor compliance with UK data protection law
5. Advise on and assist the school with carrying out data protection impact assessments
6. Act as a point of contact for communications from the Information Commissioner's Office
7. Conduct data protection impact assessments
8. Ensure data is handled in accordance with data protection legislation
9. Ensure footage is obtained in a legal, fair and transparent manner
10. Ensure footage is destroyed when it falls out of the retention period
11. Keep accurate records of all data processing activities and make the records public on request
12. Inform subjects of how footage of them will be used by the school, what their rights are, and how the school will endeavour to protect their personal information
13. Ensure that the CCTV systems are working properly and that the footage they produce is of high quality so that individuals pictured in the footage can be identified
14. Ensure that the CCTV system is not infringing on any individual's reasonable right to privacy in public spaces
15. Carry out termly checks to determine whether footage is being stored accurately, and being deleted after the retention period
16. Receive and consider requests for third-party access to CCTV footage

6.4 The Nursery Manager and Head of Infant and Junior School will -

1. Take care of the day-to-day maintenance and operation of the CCTV system
2. Take responsibility for all day-to-day leadership and management of the CCTV system
3. Oversee the security of the CCTV system and footage
4. Check the system for faults and security flaws.

6.5 Nursery Nurses, and Infant and Junior School Teachers

The Nursery Nurses and Teachers will:

1. Ensure children are aware of the cameras and their purpose. (where age appropriate/possible)
2. Continue with quality practice regardless of the CCTV system.
3. Never use CCTV as a low-level behaviour management tool.
4. Ensure Children get changed for PE in the private areas which do not contain CCTV.
5. Speak to parents about any questions they have about the CCTV system at Moorland Private School.

7. Operation of the CCTV system

- The CCTV system will be operational 24 hours a day, 365 days a year.
- The system will record audio.
- Recordings will have date and time stamps.

8. Storage of CCTV footage

Footage will be retained for 30 days. At the end of the retention period, the files will be overwritten automatically.

On occasion footage may be retained for longer than 30 days, for example where a law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation.

Recordings will be downloaded and encrypted, so that the data will be secure and its integrity maintained, so that it can be used as evidence if required.

The DPO will carry out termly checks to determine whether footage is being stored accurately, and being deleted after the retention period.

9. Access to CCTV footage

Access will only be given to authorised persons, for the purpose of pursuing the aims stated in section 1.1, or if there is a lawful reason to access the footage.

Any individuals that access the footage, in addition to Mrs Harrison, Miss Mossdrop and Miss Ashleigh McKeown, must record their name, the date and time, and the reason for access in the access log after gaining permission from one of the above named.

The CCTV monitoring capability is only located in secure office(s). Currently in Miss Mossdrop's nursery office and Miss McKeown's office within the junior school.

All operators are trained to understand their responsibilities under the CCTV Code of Practice.

9.1 Staff access

The following members of staff have authorisation to access the CCTV footage:

1. The Nursery Proprietor
2. Nursery Manager
3. Infant & Junior School Proprietor
4. Head of Infant and Junior School
5. Anyone with express permission of the Proprietor

CCTV footage will only be accessed from authorised personnel's work devices, or from the visual display monitors. Any member of staff who misuses the surveillance system may be committing a criminal offence and will face disciplinary action.

9.2 Third-party access

CCTV footage will only be shared with a third party to further the aims of the CCTV system set out in section 1.1 (e.g. assisting the police in investigating a crime). In addition, for purposes to assist a safeguarding concern, insurance matter, such as an accident and or a serious regulator/parental complaint.

Footage will only ever be shared with authorised personnel such as law enforcement agencies or other service providers who reasonably need access to the footage (e.g. investigators).

All requests for access should be set out in writing and sent to the headteacher and the DPO.

The school will comply with any court orders that grant access to the CCTV footage. The school will provide the courts with the footage they need without giving them unrestricted access. The DPO will consider very carefully how much footage to disclose and seek legal advice if necessary.

The DPO will ensure that any disclosures that are made are done in compliance with UK GDPR.

All disclosures will be recorded by the DPO.

10. Data protection impact assessment (DPIA)

Moorland follows the principle of privacy by design. Privacy is considered during every stage of the deployment of the CCTV system, including its replacement, development and upgrading.

The system is used only for the purpose of fulfilling its aims (stated in section 1.1).

Those whose privacy is most likely to be affected, including the school community and neighbouring residents, will be consulted during the DPIA, and any appropriate safeguards will be put in place.

A new DPIA will be done annually and/or whenever cameras are moved, and/or new cameras are installed.

If any security risks are identified in the course of the DPIA, the school will address them as soon as possible.

11. Security

1. Miss Hayley Mossdrop and Miss Ashleigh McKeown will be responsible for overseeing the security of the CCTV system and footage
2. The system will be checked for faults once a term
3. Any faults in the system will be reported as soon as they are detected and repaired as soon as possible, according to the proper procedure
4. Footage will be stored securely and encrypted wherever possible
5. The CCTV footage will be password protected and any camera operation equipment will be securely locked away when not in use
6. Proper cyber security measures will be put in place to protect the footage from cyber attacks
7. Any software updates (particularly security updates) published by the equipment's manufacturer that need to be applied, will be applied as soon as possible

12. Queries

All queries should be directed to Mrs Frost and should be made according to the school's complaints policy.

13. Monitoring

The policy will be reviewed annually by the SLT and the DPO to consider whether the continued use of a surveillance camera remains necessary, proportionate, and effective in meeting its stated purposes.