



**IMPACT PUPIL REFERRAL UNIT**

**CCTV POLICY**

**APPROVED BY GOVERNORS: September 2023**  
**POLICY TO BE REVIEWED: September 2024**

Impact considers a CCTV Scheme can contribute to security and the health and safety of students, staff and visitors and the local community.

The purposes of the CCTV Scheme at Impact also provides monitoring systems to assist with the protection of the public property, community safety, thereby improving the quality of life for the public in general.

The day to day management of the CCTV system will be the responsibility of the Site Manager.

### **Siting the Cameras**

The Governing Body has considered the proper location of CCTV cameras, where they exist, in and around Impact. The location of additional cameras is based upon a variety of information including security and health and safety.

### **Standards**

All such CCTV equipment installed in Impact will only be sited in such a way that it only monitors those spaces that are intended to be covered by the equipment.

CCTV will not overlook neighboring properties.

The employees and students will be made aware of the purpose(s) for which the scheme has been established and notices to this effect will be displayed in the school reception area and the school hall foyer. Parents will be informed through correspondence and website.

The operators will only use the equipment in order to achieve the purpose(s) for which it has been installed.

Cameras that are adjustable by the operators will not be adjusted or manipulated by them to overlook spaces which are not intended to be covered by the scheme.

If it is not possible physically to restrict the equipment to avoid recording images from those spaces not intended to be covered by the scheme, then operators will be trained in recognising the privacy implications of such spaces being covered.

Signs, of no less than the minimum standard will be placed so that the public are aware that they are entering a zone that is covered by CCTV.

The signs should be clearly visible and legible to members of the public.

### **Quality of Images Standards**

Upon installation an initial check will be undertaken to ensure that the equipment performs properly. Regular checks will be made thereafter to ensure that the system is operating properly.

Images are retained on a hard disc drive for a period of 31 days. Copies can be made for investigation purposes.

Cameras will only be situated so that they will capture images relevant to the purpose for which the scheme has been established.

When installing cameras, consideration must be given to the physical conditions in which the cameras are located.

Cameras are to be properly maintained and serviced to ensure that clear images are recorded. Servicing will be carried out at least annually.

Cameras should be protected from vandalism in order to ensure that they remain in working order.

A maintenance log will be kept in the monitoring centre of the system concerned.

The Site Manager will be:

- a) *The person responsible for making arrangements for ensuring that a damaged camera is fixed;*
- b) *Ensuring that the camera is fixed within a specific time period;*
- c) *Monitoring the quality of the maintenance work,*

## **Processing the**

### **Images Standards**

Images should not be retained for longer than is necessary and unless required for specific investigation or evidential purposes, deleted after 31 days have passed.

Once the retention period has expired, the images should be removed or erased.

Images that are to be retained for evidential purposes will be retained in a secure place to which access is controlled.

Monitors displaying images from areas in which individuals would have an expectation of privacy should not be viewed or be capable of being viewed by anyone other than authorised persons.

Access to the recorded images should be restricted to a manager or designated member of staff who will decide whether to allow requests for access.

Viewing of the recorded images should take place in a restricted area, for example, in a manager's or designated member of staff's office, other employees should not be allowed to have access to that area when a viewing is taking place.

All operators and employees with access to images should be aware of the procedure that needs to be followed when accessing the recorded images.

All operators should be trained in their responsibilities under the Code of Practice, i.e. they should be aware of:

- a) *The user's security policy e.g. procedures to have access to*
- b) *recorded images;*
- c) *The user's disclosure policy*

## **Access to and disclosure of images to third**

### **Third Parties Standards**

All employees should be aware of the restrictions set out in this code or practice in relation to access to, and disclosure of, recorded images.

Access to recorded images will be restricted to those persons who need to have access in order to achieve the purpose(s) of using the equipment.

All access to the medium on which the images are recorded should be documented.

Disclosure of the recorded images to third parties should only be made in limited and prescribed circumstances. Subject to paragraph 1 above, in disclosure will be limited to the following classes of persons/agencies:

- *Law enforcement agencies, where the images recorded would assist in a specific enquiry;*
- *Highways authorities in respect of traffic management matters;*
- *Prosecution Agencies;*

All requests for access or for disclosure should be recorded, if access or disclosure is denied, the reason should be documented.

Recorded images will not be made more widely available – for example they should not be routinely made available to the media or placed on the Internet.

## **Access by data**

### **Subjects Standards**

In accordance with GDPR (Subject Access Request), an individual who believes that their image has been captured by this scheme is entitled to make a written request to the Data Controller. Upon the supply of essential information, a system search will be conducted and, subject to certain conditions, the individual will be allowed access to the personal data held.

All subject access requests should be referred in the first instance to the Head teacher.

All staff involved in operating the equipment must be able to recognise a request for access to recorded images by data subjects and how such requests are to be dealt with.

Data subjects should be provided with a standard Subject Access Request form, which indicates,

- a) Indicates the information required in order to locate the images requested;*
- b) Indicates the information required in order to identify the person making the request;*
- c) Indicates the fee that will be charged for carrying out the search for the images requested.*

NB. The above form will also enquire whether the individual would be satisfied with merely viewing the images recorded. The form will also indicate that the response will be provided promptly and in any event within 30 days of receiving.

Individuals, at the time of any subject access request, will be given a description of the type of images recorded and retained and the purpose for which the recording and retention takes place. They should be informed of their rights as provided by the GDPR.

Prior to any authorised disclosure, the Head teacher will need to determine whether the images of another “third party” individual features in the personal data being applied for and whether these third party images are held under a duty of confidence.

If third party images are not to be disclosed the Network Manager shall arrange for the third party images to be disguised or blurred.

If the Head teacher decides that a subject access request from an individual is not to be complied with, the following should be documented:

- a. The identity of the individual making the request;*
- b. The date of the request;*
- c. The reason for refusing to supply the images requested;*
- d. The name and signature of the person making the decision.*

### **Other rights**

Under the Data Protection Act individuals also have the following rights which may be applicable to CCTV schemes:

- *Right to prevent processing likely to cause damage or distress;*
- *Rights in relation to automated decision taking;*
- *Right to seek compensation for failure to comply with certain requirements.*

Where a request is made in relation to other rights, these shall be referred to the Head teacher who will document the request and respond to it within 28 days.