



SHERFIELD
SCHOOL

CCTV Policy & Privacy Notice

This policy applies all pupils in the school, including in the EYFS

Created **Duncan Page**

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Head of School. Caroline Taylor

Introduction

This policy and privacy notice outlines what can be expected when the school is collecting static or moving imagery via CCTV surveillance systems. The school maintains a commitment to protect everyone's safety and welfare, as well as the security of the school, all while ensuring that personal information is respected.

The school is the **data controller** of CCTV imagery as it is responsible for determining the purposes of personal data and how it is processed.

As a pupil, staff member or visitor, you are the **data subject** as CCTV imagery will make you identifiable through your physical appearance.

Any queries relating to this notice should be directed to the Data Protection Officer, Kirsty Humphreys.

Why the school uses CCTV

The school feels that it is necessary to use CCTV cameras to maintain a safe environment for all pupils, staff and visitors.

The use of CCTV helps to ensure that:

- The welfare of pupils, staff and visitors is protected.
- Criminal acts are deterred or dealt with.
- The school can assist the police in identifying people who have committed an offence.
- Crimes can be prevented, investigated and detected.
- The security of the school site is monitored.

The school has a lawful basis for using CCTV imagery with the appropriate consideration given to the UK GDPR and relevant schedules of the Data Protection Act 2018.

The school's accountability

The school recognises its requirement to maintain accountability and to take responsibility for how it complies with data protection legislation when processing data.

The school is under a duty to register its details with the Information Commissioner's Office (ICO) and to:

- Tell people that they may be recorded, e.g. via clearly visible signs.
- Control who can see the recordings. Only the Head gives permission for access, and the DPO & DSL access the actual footage.
- Ensure the system is only used for the purpose it was intended for.

The school's Data Protection Policy outlines how it will remain accountable for its actions when processing personal data. A copy of this is available on the school website.

Under Article 30 of the UK GDPR, the school is required to maintain a record of the data processing activities that are taking place and will therefore ensure that the purpose of CCTV surveillance is lawful.

The school will never ignore images captured on CCTV which depict criminal activity, gross misconduct or behaviour that puts individuals at risk.

Storage of digital CCTV imagery

The school will not keep a record of CCTV imagery for longer than is needed and will define the length of time that each article of CCTV imagery is required to be held by the school.

Images captured by CCTV will not usually be kept for longer than 30 days; however, imagery required for investigatory purposes may be retained for longer.

CCTV imagery will be securely stored, and only a limited number of authorised individuals will be able to access it.

Recorded images will usually only be viewed in investigatory circumstances, e.g. if a crime has been committed or where an allegation has been made.

Only authorised individuals will have access to the room in which CCTV imagery can be viewed; however, CCTV imagery that depicts criminal activity may be handed over to the police.

Sharing of CCTV footage

The school might need to share footage with lawful authorities (e.g. the police) or third parties under the following circumstances:

- to protect pupils and vulnerable people (e.g. following a safeguarding concern)
- when life has been endangered
- when it provides evidence of potential criminal activity

Data subjects' rights and raising complaints

Under the UK GDPR, you have the right to:

- Access your personal data by making a subject access request.
- Have information regarding you erased or restricted, as long as this information is not required under a lawful basis for processing as outlined in the UK GDPR, e.g. where CCTV imagery depicts a data subject engaging in criminal activity.
- Object to the processing of your information.

If you are unhappy with the way that the school is using CCTV to record you or someone you know, please contact the school's Data Protection Officer, who will be able to provide more information on why CCTV is being used, deal with any concerns and allow you to see an example of what cameras are recording.

Requests to view CCTV imagery will only be valid if the imagery depicts your child, you or an empty space. All other individuals will be anonymised.

Where requests are made to see an example of CCTV imagery, as long as the request is valid, this will be provided within one calendar month.

If you have raised a complaint that has not been resolved internally by the school, you can refer the matter to the ICO, who can investigate and decide on how to manage any data protection concerns you raise with them.