

Maple Cross JMI & Nursery School
Care and Achieve



**GDPR - CCTV Policy
Review Period 3 years**

Reviewed without amendments on: Chair *E. Maybels*

Date: 8/7/2019

Head *H. Trickett*

Reviewed with amendments

Reviewed without amendments: Chair _____

Date: _____

Head _____

Reviewed with amendments:

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Date: _____

Head _____

We follow the ICO's data protection code of practice for surveillance cameras and personal information. (ref Version 1.2, 20170609)

Our Setting

Maple Cross JMI & Nursery School is a small, one form entry primary school in extensive grounds on the edge of Maple Cross Village. Our grounds feel very private but are exposed to risk as we are well set back from the roads and only have houses on one side of our grounds.

Deciding When a Surveillance System should be Used

Using surveillance systems can be privacy intrusive. They are capable of placing large numbers of law-abiding people under surveillance and recording their movements as they go about their day-to-day activities. We therefore have carefully considered whether or not to use a surveillance system. This has include taking into account the nature of the problems we are seeking to address; whether a surveillance system would be a justified and an effective solution, whether better solutions exist, what effect its use may have on individuals, and whether in the light of this, its use is a proportionate response to the problem. We must also regularly evaluate whether it is necessary and proportionate to continue using the system.

Privacy risk

Some of the ways this risk can arise is through personal information being:

- inaccurate, insufficient or out of date;
- excessive or irrelevant;
- kept for too long;
- disclosed to those who the person it is about does not want to have it;
- used in ways that are unacceptable to or unexpected by the person it is about; or
- not kept securely.

Aims & Coverage

We use our CCTV system to:

- help us monitor and control access to the school building and the main school grounds.
- help us monitor activity in the school car park.
- provide support information should there be a security incident, for example, unauthorised access to the school
- provide clarity or support in the resolution of a behaviour incident (whether of staff, pupil, parent or visitor) occurring in the front of the school
- help prevent and detect crime.

Our cameras are sited to cover the school front door and the gates to the playground. The cameras for the gates also cover the school car park and houses beyond. The distance to our neighbours' houses and gardens is such that the resolution does not intrude on their privacy. (The neighbours are also well screened by trees.)

Our System

We have a stand-alone (closed circuit) system with three cameras.

- The system is not linked to any other school systems, the internet or our phone lines.
- The system does not have any automatic recognition applications.

Our system

- displays what is seen by the cameras
- records what is seen by the cameras
- allows playback of what is recorded
- allows copying of what is recorded onto DVD drive and USB connections.

Who has access to our system?

The office staff, Headteacher and Assistant Heads' know how to access and operate the system.

Our monitors are not in public places, but are in areas where all staff visit frequently and we may invite parents and visitors. We have reviewed this and found it to be acceptable as the areas covered by the system are public areas and similar to the views available to the rooms containing the monitors.

It is not appropriate to review recorded images whilst other people are in the office.

When requested, and if we feel it is appropriate, we will provide copies of images/video to:

- the police
- (in connection with disciplinary actions) school files, Hertfordshire County Council and their agents, and staff trade unions
- (in relation to child protection/safeguarding) other relevant agencies

NOTE: Even if a system was not established to prevent and detect crime, it would still be acceptable to disclose information to law enforcement agencies if failure to do so would be likely to prejudice the prevention and detection of crime.

In some limited circumstances it may be appropriate to release information to the police if instructed.

Parents will only have access to footage at the Headteacher's discretion (in consultation with SLT) provided other children are not identifiable.

SARS

Decisions regarding requests made to view video footage will be based on the GDPR 2018. circumstances where this obligation does not apply. (these are listed in the ICO's code of practice.)

Data Storage, Retention and Disposal

See School Data Retention Policy

System Review

We will review the siting, processing and data storage of data, and whether the system meets our needs on an annual basis.