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## CCTV Protocol

Newent Community School and Sixth Form Centre uses Close Circuit Television (“CCTV”) within the premises of the Newent Community School and Sixth Form Centre. The purpose of this protocol is to set out the position of the Newent Community School and Sixth Form Centre as to the management, operation and use of the CCTV at the Newent Community School and Sixth Form Centre.

This protocol applies to all members of our Workforce, visitors to the School’s premises and all other persons whose images may be captured by the CCTV system.

This protocol takes account of all applicable legislation and guidance, including:

- General Data Protection Regulation (“GDPR”)
- Data Protection Act 2018 (together the Data Protection Legislation)
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998

This protocol sets out the position of Newent Community School and Sixth Form Centre in relation to its use of CCTV.

### **Purpose of CCTV**

Newent Community School and Sixth Form Centre uses CCTV for the following purposes:

- To provide a safe and secure environment for students, staff and visitors.
- To prevent the loss of or damage to the Newent Community School and Sixth Form Centre buildings and/or assets.
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.

### **Description of system**

The system was installed by AllCoopers Limited and comprises of:

- 8 x 2MP IP Starlight Dome Camera with 50m IR Illumination, Wide Dynamic Range and Vari-Focal Eye-Ball Turret
- 45 x 2-MP Starlight IP Bullet Camera with varifocal lens and 200m Infra-Red illumination

All cameras in a fixed position.

### **Siting of cameras**

All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.

Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The Academy will make all reasonable efforts to ensure that areas outside of the Academy’s premises are not recorded.

Signs will be erected to inform individuals that CCTV is in operation across the site.

Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.



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## **Privacy Impact Assessment**

Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by Newent Community School and Sixth Form Centre to ensure that the proposed installation is compliant with legislation and ICO guidance.

The Academy will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

### **Management and access**

The CCTV system will be managed by the Data Protection Officer. On a day to day basis the CCTV system will be operated by the Business Manager.

The viewing of live CCTV images will be restricted to the Principal, Business Manager and SAFE Officers.

Recorded images which are stored by the CCTV system will be restricted to access by the Principal, Business Manager, Assistant Principals and SAFE Officers.

No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this protocol as to disclosure of images.

The CCTV system is checked weekly by the IT Technician to ensure that it is operating effectively

### **Storage and retention of images**

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

Recorded images are stored only for a maximum period of 31 days unless there is a specific purpose for which they are retained for a longer period.

The Academy will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

- CCTV recording systems being located in restricted access areas;
- The CCTV system being encrypted/password protected;
- Restriction of the ability to make copies is restricted to the Business Manager and the SAFE Officers.

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by the Newent Community School and Sixth Form Centre.

### **Disclosure of images to data subjects**

Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.

Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the Academy's Subject Access Request Protocol.

When such a request is made the Business Manager and SAFE Officers will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.



If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The Business Manager and SAFE Officers must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals then the Academy must consider whether:

- the request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals
- the other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained
- if not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

A record must be kept, and held securely, of all disclosures which sets out:

- when the request was made
- the process followed by Business Manager and SAFE Officers in determining whether the images contained third parties
- the considerations as to whether to allow access to those images
- the individuals that were permitted to view the images and when
- whether a copy of the images was provided, and if so to whom, when and in what format.

### **Disclosure of images to third parties**

Newent Community School and Sixth Form Centre will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

If a request is received from a law enforcement agency for disclosure of CCTV images then Business Manager and SAFE Officers must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

The information above must be recorded in relation to any disclosure.

If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

### **Review of protocol and CCTV system**

This protocol will be reviewed annually. The CCTV system and the privacy impact assessment relating to it will be reviewed annually.

### **Misuse of CCTV systems**

The misuse of CCTV system could constitute a criminal offence. Any member of staff who breaches this protocol may be subject to disciplinary action.



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## **Complaints relating to this protocol**

Any complaints relating to this protocol or to the CCTV system operated by Newent Community School and Sixth Form Centre should be made in accordance with the Complaints Procedure.

August 2020



## CCTV PRIVACY IMPACT ASSESSMENT TEMPLATE

Who will be captured on CCTV?

Students, staff, parents / carers, volunteers, governors and other visitors including members of the public using the community facilities.

What personal data will be processed?

Body and facial images, behaviour and movement around site.

What are the purposes for operating the CCTV system? Set out the problem that Academy is seeking to address and why the CCTV is the best solution and the matter cannot be addressed by way of less intrusive means.

Prevention or detection of crime, safeguarding measures of our students, staff and other visitors.

What is the lawful basis for operating the CCTV system?

Legal obligation, legitimate interests of the organisation to maintain health and safety and to prevent and investigate crime.

Who is/are the named person(s) responsible for the operation of the system?

The Data Protection Officer

Describe the CCTV system, including:

- a. how this has been chosen to ensure that clear images are produced so that the images can be used for the purpose for which they are obtained
- b. siting of the cameras and why such locations were chosen
- c. how cameras have been sited to avoid capturing images which are not necessary for the purposes of the CCTV system
- d. where signs notifying individuals that CCTV is in operation are located and why those locations were chosen
- e. whether the system enables third party data to be redacted, for example via blurring of details of third party individuals.



- a. The system has been established on a proper and legal basis and we comply with the Data Protection Act, Human Rights Act and Regulations of Investigatory Powers Act, General Data Protection regulations Regular reviews of camera performance are undertaken to justify their need
- b. cameras have been sited to ensure appropriate coverage of the Academy's premises in particular the access points to the grounds and individual buildings
- c. cameras have been sited taking in to due account the distance of the image capture in relation to the Academy's perimeter fence
- d. signs are located at the front of the premises in full view of the main access points
- e. the CCTV system is able to anonymise individuals should the need arise as part of a Subject Access Request

Set out the details of any sharing with third parties, including processors

There is no access to the school's CCTV system by external agencies or third parties without prior consent from the Data Protection Officer of the Academy

If faults develop with the system, appropriate contractor support is sought and the system is repaired appropriately. Such contractors should have no access to images or recorded data as part of any remedial work undertaken.

Set out the retention period of any recordings, including why those periods have been chosen

Recorded images are stored only for a maximum period of 31 days unless there is a specific purpose for which they are retained for a longer period.

Set out the security measures in place to ensure that recordings are captured and stored securely

The hardware recorder and viewing monitor are stored securely in a locked server room. Access to this room is restricted through the Academy's access control system. Access to the software to view the images (live and/or recorded) on a PC is limited to the Business Manager and SAFE Officers. Access to the software is password protected. The password is known only to the Business Manager and ICT Technician.

Recorded images, whilst temporarily stored for the purpose of investigation, are done so with further password protection.

What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?

The privacy risks and solutions can be summarised as:



Personal data retained for longer than necessary or personal data collected and stored unnecessarily – video images will be retained for 31 days unless the Academy is notified before deletion that they are required by: a data subject, insurance company, the police or other investigation agency.

The Academy will only release footage where it is permitted to do so to law enforcement agencies, and those other agencies that have a lawful reason to be provided with access to the images. Legitimate access to recorded images is set out in the CCTV Protocol. A log of all access to and download of recorded images is maintained.

When necessary other subjects in the footage will have their identity obscured to maintain their privacy. The DPIA considers the option for less intrusive means for achieving the same or a similar aim but none available will meet the requirements set out above.

The CCTV equipment, cameras and review and control equipment are password protected which markedly reduces the risk of unauthorised access. Individuals can submit a Subject Access Request in accordance with their rights; this is an important part of the necessary checks and balances to ensure that the use of the CCTV system is proportionate.

What measures are in place to address the risks identified?

The school is satisfied that the current CCTV system in place at the Academy is necessary and sufficient so as to support the Academy's desire to prevent or detect crime and to monitor the premises, grounds and buildings in order to provide a safe and secure environment for its students, staff and visitors, and to prevent loss or damage to property.

The Academy satisfies all external advice (e.g. ICO CCTV Code of Practice 2017) on the operation and usage of CCTV systems and has a compliant CCTV usage Policy in place.

No further actions are deemed necessary at this review.

Have parents and students where appropriate been consulted as to the use of the CCTV system? If so, what views were expressed and how have these been accounted for?

No consultation on the use of the CCTV system was undertaken, however, signs are in place to inform users of the Academy's premises that a system is in operation.

When will this privacy impact assessment be reviewed?

Annually, with the next review in August 2021.

**Approval:**

This assessment was approved by the Data Protection Officer:

Data Protection Officer - August 2020