



Version	Sept 2021
Owner	Skelton Primary School
Approved	Sept 2021
Review Cycle	2 year
Next Review	Sept 2023

Skelton Primary School offers a positive, safe learning environment for its community, in which everyone has equal and individual recognition and respect. We celebrate success and are committed to the continuous improvement and fulfilment of potential in every child.

We encourage increasing independence and self-discipline amongst the pupils. Everyone within the school has an important role to play in sharing responsibility for the development of positive behavior and attitudes.

## Keeping Children Safe Surveillance Policy 2021

Designated Safeguarding Lead: Andy Woolf  
Deputy Safeguarding Leads: Sarah Walker  
Charlotte Bonas  
Tracy Hill  
Safeguarding Link Governor: Geoff Bland  
Head Teacher: Sarah Walker  
Chair of Governors: Helen Swarbrick



# Surveillance Policy

## **Introduction**

This policy is concerned with the use and governance of surveillance technology, and the processing of Personal Data which has been collected by using surveillance technology. The policy is written in accordance with various Data Protection legislation, which includes but is not limited to the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA), and the Information Commissioner's Office's (ICO) surveillance code of practice.

Queries about this policy should be directed to Skelton Primary School's Data Protection Officer.

## **Scope**

This policy applies to all school employees (both those employed directly by the school and those employed on behalf of the school by a local authority or other such body), any authorised agents working on behalf of the School, including temporary or agency staff, governors, volunteers, and third party contractors.

This Policy will refer to all individuals within scope of the policy as 'employees'. Employees who are found to knowingly or recklessly infringe this policy may face disciplinary action.

Surveillance is the monitoring of behaviour, activities, or other changing information for the purpose of influencing, managing, directing, or protecting people. The school only uses surveillance in the context of CCTV.

The school does not operate covert surveillance technologies and therefore this policy does not cover the use of such technology.

## **CCTV**

The school operates 'Closed Circuit Television' (CCTV) systems in order to

- safeguard children,
- for the prevention and detection of crime

### *Planning CCTV Systems*

Any new implementation of CCTV systems will employ the concept of 'privacy by design' which will ensure that privacy implications to data subjects will be considered

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SLT responsibility: A.Woolf

before any new system is procured. The prescribed method for this is through the completion of a Data Protection Impact Assessment (DPIA).

The school has various statutory responsibilities to protect the privacy rights of data subjects. Therefore during this planning phase the school will consider:

1. The purpose of the system and any risks to the privacy of data subjects,
2. That there are statutory requirements placed on the location and position of cameras. This means that cameras must be positioned to meet the requirement(s) of the intended purpose(s) and not exceed the intended purpose(s).
3. The obligation to ensure that the CCTV system can meet its intended purpose(s) also means that the system specification must be such that it can pick up any details required for these aims. For example the system must record with sufficient resolution to perform its task.
4. The system must also have a set retention period (the retention period is six weeks) and, where appropriate, the school must also have the ability to delete this information prior than the set retention period in order to comply with the rights of data subjects.
5. That the school will need a level of access to the system and there will need to be the option to provide other agencies (such as law enforcement agencies) with specific footage if requested. If a data subject is captured and recorded by the system, then that individual also has the right to request a copy of that footage under subject access provisions.

The school will ensure that a contract will be agreed between the school (as Data Controller) and the CCTV system provider. Consideration should also be given as to whether there are any joint data controller arrangements where the system is shared with another organisation. Data Processing clauses must be included within the written contract if the provider will be processing (e.g. monitoring, storing, accessing) the data on behalf of the school.

#### *CCTV Privacy Notices*

The processing of personal data requires that the individuals that the data relates to (in this case any individuals captured by the CCTV) are made aware of the processing. Therefore the use of CCTV systems must be visibly signed.

The signage will include the purpose for the system (e.g. the prevention or detection of crime), the details of the organisation operating the system and who to contact about the system (including basic contact details). The signage must be clear

enough that anyone entering the recorded area will be aware that they are being recorded.

A more detailed Privacy Notice for the use of CCTV must be maintained with the intention of informing data subjects of their rights in relation to surveillance data.

#### *Access to CCTV Recordings*

CCTV footage will only be accessed to comply with the specified purpose. For example if the purpose of maintaining a CCTV system is to prevent and detect crime then the footage must only be examined where there is evidence to suggest criminal activity having taken place.

The CCTV system will have a nominated Information Asset Owner who will be responsible for the governance and security of the system. The Information Asset Owner will authorise officers to access CCTV footage either routinely or on an ad-hoc basis.

#### *CCTV Footage Disclosures*

A request by individuals for CCTV recordings that include footage of them should be regarded as a subject access request (SAR). For more information on the right of access for individuals captured on CCTV, refer to the School's Information Policy.

If the school receives a request from another agency (for example a law enforcement agency) for CCTV recordings, then it will confirm the following details with that agency:

1. the purpose of the request,
2. that agency's lawful basis for processing the footage,
3. confirmation that not receiving the information will prejudice their investigation,
4. whether the School can inform the data subject of the disclosure, and if not, the reasons for not doing so.

The School will liaise with its appointed Data Protection Officer should it have any concerns about such requests.

#### *Review of CCTV*

CCTV systems must be reviewed biennially to ensure that systems still comply with Data Protection legislation and national standards. The Information Asset Owner should use the checklist included in Appendix 1 of this policy to complete this review. It is the responsibility of the Information Asser Owner to ensure reviews are completed and evidence of those reviews taking place are maintained.

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Next review: April 2020

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## **Complaints**

Complaints by individuals about the use of surveillance systems, or the way surveillance data is processed, should be treated as a data protection concern and the school's data protection officer should be made aware.

The School's Data Protection Officer is:

Information Governance  
Veritau Ltd  
County Hall  
Racecourse Lane  
Northallerton  
DL7 8AL



[schoolsDPO@veritau.co.uk](mailto:schoolsDPO@veritau.co.uk)  
01609 53 2526

## **Records of Processing**

The school has a duty under Article 30 of the GDPR to ensure that all instances of data processing activity is recorded for regulatory inspection where required. The school maintains an information asset register in order to fulfil this requirement.

The school will ensure that the use of surveillance systems is recorded on their information asset register. This should detail each separate surveillance system in use.

## **Related Documents**

Employees who are responsible for planning, maintaining, or reviewing the implementation of a surveillance system are encouraged to read the following related documents prior to implementation:

- [ICO Surveillance Code of Practice \(External Link\)](#)
- The School's Data Protection Impact Assessment (DPIA) Template (available through Veritau)

Skelton Primary School's governing body will be responsible for evaluating and reviewing this policy every 2 years

## Appendix 1 – Surveillance System Checklist

**School Name: Skelton Primary School**

Name and Description of Surveillance System:		
The purpose and requirements of the system are addressed by the system (i.e the cameras record the required information)	<b>YES</b>	<b>NO</b>
	<b>Notes: Enable safe secure access to visitor car park</b>	
The system is still fit for purpose and produces clear images of adequate resolution.	<b>YES</b>	<b>NO</b>
	<b>Notes:</b>	
Cameras are sited in effective positions to fulfil their task.	<b>YES</b>	<b>NO</b>
	<b>Notes: Entrance to visitor car park only</b>	
Cameras are positioned so that they avoid capturing the images of persons not visiting the premises and/or neighbouring properties.	<b>YES</b>	<b>NO</b>
	<b>Notes: Camera zoomed to avoid neighbouring properties</b>	
There are visible signs showing that CCTV is in operation. These signs include: <ul style="list-style-type: none"> <li>▪ Who operates the CCTV,</li> <li>▪ Their contact details,</li> <li>▪ What the purpose of the CCTV is.</li> </ul>	<b>YES</b>	<b>NO</b>
	<b>Notes:</b>	
	<b>YES</b>	<b>NO</b>

CCTV recordings are securely stored and access limited.	<b>Notes: hard drive stored securely</b>	
The system has the capability to transfer recordings to law enforcement or to fulfil a request for an individual's own personal information.	<b>YES</b>	<b>NO</b>
	<b>Notes: Hard drive with USB connection</b>	
The system has a set retention period. This retention period should only be long enough to fulfil the CCTV's purpose and not longer. Outside of this retention period information should be deleted	<b>YES</b>	<b>NO</b>
	<b>Notes: Set for one month</b>	
The system users should be able to selectively delete information still inside the retention period to fulfil the right to erasure.	<b>YES</b>	<b>NO</b>
	<b>Notes:</b>	
All operators have been authorised by the Information Asset Owner and have sat their mandatory data protection training.	<b>YES</b>	<b>NO</b>
	<b>Notes: Asset owned by School Office Manager</b>	
This system has been declared on the corporate register of surveillance systems.	<b>YES</b>	<b>NO</b>
	<b>Notes:</b>	

<b>Checklist Completed By:</b> Name: A.Woolf Job Title: Assistant Head Date: April 19	<b>Checklist Reviewed and Signed By (Information Asset Owner):</b> Name: C McCluskie Job Title: Office Manager Date: April 19
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## Appendix 1

Record of any downloads of CCTV to be removed from building.

Event No.	Date	Recording date	Reason for download	Copy taken by...	Signature	Authorised by...	Signature confirming destruction.
001							
002							
003							
004							
005							