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**YSGOL**  
**TREFFYNNON**



# CCTV Policy

<b>School</b>	Ysgol Treffynnon
<b>Date policy approved and adopted</b>	10 <sup>th</sup> September 2018
<b>Reviewed By</b>	Interim Executive Board
<b>Review frequency</b>	Annually
<b>Next review date</b>	June 2019
<b>Designated Senior Person (DSP)</b>	Anneke Perrett

## **Introduction**

This Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Ysgol Treffynnon and Ysgol Maes Y Felin.

The system comprises a number of fixed and dome cameras located around the school site.

All cameras are monitored within the school and by the school's preferred monitoring company. This policy follows guidelines issued by the CCTV Commissioner and The Information Commissioner.

The CCTV system is owned by the school.

## **Why does the school have CCTV?**

- To protect the school buildings and assets.
- To improve personal safety and reduce the fear of crime.
- To protect and maintain the well-being of people and their property who may be on the site.
- To assist staff in identifying and resolving incidents.
- To assist the Police in a bid to deter and investigate crime and assist in identifying, and prosecuting offenders.

## **Policy Statement**

Whilst operating CCTV, the school will comply with guidance and codes of practice issued by:

- Information Commissioner Office
- Surveillance Camera Commissioner

The school continue to be registered with the Information Commissioner under the terms of the General Data Protection Regulation and the Data Protection Act 2018 and will to the best of its ability comply with Data Protection, Privacy and Human Rights requirements.

The school treats the system and all information, documents and recordings obtained and used as data in accordance with legislation. Recordings will only be released for use in the investigation of a specific crime following a specific request by the Police.

## **Lawful Basis for Processing**

Cameras will be used to monitor activities within the school and its car parks and other public areas to identify potential or actual criminal activity or behaviour which does not comply with school codes of conduct and for securing the safety and well-being of pupils' staff and visitors.

Static cameras will not be focused on private homes, gardens or other areas of private property, these areas are automatically pixelated.

Processing is considered to form part of the Schools Public Task, therefore, the lawful basis of processing is considered to be:

Article 6(1)(e,) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

Images of individuals captured by the system have a right to object and should follow the complaints procedure defined below.

### **CCTV coverage**

- Within the building the CCTV coverage is in corridors, stairwells, access areas, public and social areas.
- Warning signs are displayed appropriately, as required by the Code of Practice of the Surveillance & Information Commissioners.
- CCTV system will be operated 24 hours each day, every day of the year.

### **How Long is data retained**

Unless data is by the school or authorised bodies, eg Police for investigation purposes, data will be kept for 30 days and then over-written. If required for investigatory purposes, data will be destroyed as soon as it is no longer required.

### **Roles**

The **Governing Body** The Governing Body is the Data Controller and owns the policy, fulfil a monitoring role, manage complaints and review the policy as appropriate.

The Data Protection Officer will provide advice and assistance in these functions.

The **Head Teacher** has responsibility for overall operation of the system. The Head Teacher has day to day responsibility and accountability for how the school uses the CCTV systems. The Head Teacher will approve access requests for data held on the CCTV. In the Head Teacher's absence an appointed deputy may approve access.

The **School Business Manager** has day-to-day management of the system and ensuring appropriate checks are carried out on a regular basis and ensuring data is disposed of appropriately

The **Data Protection Officer** will provide an independent overview of compliance issues. Provide advice and assistance when requested and advise and assist on complaints and the operation of the equipment. To monitor the Privacy Impact of the use of CCTV equipment

### **Complaints**

Any complaints about the school's CCTV system should be addressed initially to the Head Teacher.

If the Head Teacher is able to resolve the issue informally within 5 working days a report must be provided to The Governing Body.

If it is not possible for the Head Teacher to resolve the issue informally the individuals have the right to complain to the Chair of Governors who will adhere to the school complaints policy.

Complaints may also be directed to the School's Data Protection Officer.

Individuals also have the right to complain to the Information Commissioner's Office.

	<b>Head Teacher</b>	<b>Head Teacher</b>	<b>Data Protection Officer</b>	<b>Information Commissioner's Office</b>
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Email	<a href="mailto:mfmail@hwbcymru.net">mfmail@hwbcymru.net</a>	<a href="mailto:info@yt.flintshire.sch.uk">info@yt.flintshire.sch.uk</a>	<a href="mailto:david@gdbr.co.uk">david@gdbr.co.uk</a>	