



CONNAH'S QUAY HIGH SCHOOL

Creu Llwyddiant | Creating Success

CCTV System Policy

This Policy has been written in accordance with the most recent Government guidance. This Policy will be rewritten as necessary to reflect the changing emphasis of the school and the changes in Government legislation and reviewed biannually.

Policy Title	CCTV System Policy
Date of Publication	June 2023
Approved by & Date	23 rd October 24
SLT Lead	CHA

Introduction

This policy is to regulate the management, operation and use of the Closed Circuit Television (CCTV) system at Connah's Quay High School.

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

All cameras are monitored within the School. 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 endeavor to comply with guidance and Codes of Practice issued by the Information Commissioner (www.ico.org.uk) and the Surveillance Camera Commissioner and will continue to be registered with the Information Commissioner under the terms of the General Data Protection Regulation and the Data Protection Act 2017 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 to the media 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 behavior 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.

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, toilet entrances, open areas, access areas and car parks.

Camera's situated in toilets only show the entrance/exit door and sinks. This is to monitor the high level of vandalism.

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 required for the above purposes by the school or investigatory bodies e.g. 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.

Copies of data

For the purposes of investigations into incidents, and solely at the request of the Headteacher or other legal entities (police, courts, etc), the ICT Network Manager will make a copy of data from the CCTV system. This data will be kept on an encrypted storage device with each file on the device secured with a password. The data, and relevant passwords, will only be shared with staff and may be, as a part of an investigation, shared with external individuals or bodies. The data will not be released but will be kept on the secure storage, and encrypted to prevent unauthorized copies. The data will be destroyed once the ICT Network Manager is notified it is no longer needed by the Headteacher.

Roles

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.

Headteacher

Responsibility for overall operation of the system.

ICT Network Manager

The ICT Network Manager has day to day responsibility and accountability for how the School uses CCTV systems, management of the system, access requests, ensure appropriate checks are carried out on a regular basis and ensure data is disposed of appropriately. In their absence an appointed Deputy Headteacher and School Business Manager may approve access.

Data Protection Officer

To 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 Headteacher. If the Headteacher is able to resolve the issue informally within 2 working days a report must be provided to The Governing Body. If it is impossible for the Headteacher to resolve the issue informally the complaint will be passed to the Chair of Governors for consideration by the Governing Body and the Data Protection Officer.

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

www.ico.org.uk

Requests from a member of staff or a member of the public or a solicitor for CCTV footage of a particular accident / incident or documentation of any kind in relation to any accident / incident in School or within the School Grounds, will be checked with the Flintshire County Council Insurance Team on (01352) 702242, 702256, 702260 that there is not an ongoing claim in the system concerning the accident/incident before releasing it.

If there is a claim in the system for that particular accident / incident the Third Party Solicitor will approach the School / Insurer for the information as part of the standard disclosure. If it is a Public Liability claim and the claimant is not legally represented then the claimant should contact the School / Insurer with their request for the information.

Contacts

- School
 - Address - Connah's Quay High School, Golftyn Lane, Deeside, CH5 4BH
 - Telephone - 01244 813491
 - Email - cqmail@connahsquayhs.org.uk
- School Data Protection Officer
 - Ceri Hansom, Business Manager
 - Telephone – 01244 813491
 - Email - cqmail@connahsquayhs.org.uk
- The Information Commissioner's office
 - help line can be contacted on 029 2067 8400 (Wales helpline) or 0303 123 1113 (UK helpline)
 - Address - Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
 - Information is also available from www.ico.gov.uk.

The policy is dated June 2023. The Policy and associated Privacy Impact Assessment will be reviewed in June 2024 or sooner if appropriate.

The policy and Privacy Impact will be reviewed by the DPO, the Headteacher and signed off by the Governing Body.