



Grimsdyke School CCTV

(Adopted the model template from The DPO Centre Ltd)

Written by: Iain Sutherland **Date:** 08.10.2019

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1. Overview

- 1.1 Grimsdyke School has in place a CCTV surveillance system, "the system" within external areas of the school. Images are monitored and recorded centrally and will be used in strict accordance with this policy. The system is owned by Grimsdyke School.
- 1.2 The Mr I Sutherland, Headteacher has initial responsibility for the operation of the system and for ensuring compliance with this policy and the procedures documented. They may be contacted as follows:

*Headteacher, Grimsdyke School, Sylvia Avenue, Hatch End, Pinner, HA5 4QE;
020 8428 1324
dpo@grimsdyke.harrow.sch.uk*

In the absence of the Headteacher, this responsibility transfers to Mrs S Patel, School Business Manager. They may be contacted as follows:

*Mrs S Patel, School Business Manager, Grimsdyke School, Sylvia Avenue, Hatch End,
Pinner, HA5 4QE; 020 8428 1324
dpo@grimsdyke.harrow.sch.uk*

General Data Protection Regulations: CCTV digital images, if they show a recognisable person, are personal data and are covered by the General Data Protection Regulations. This Policy is associated with the Grimsdyke School General Data Protection Policy, the provisions of which should be adhered to at all times.

2. The system

- 2.1 The system comprises: ***Fixed position cameras with Public information signs next to them***
- 2.2 Cameras will be located at strategic points on the complex, principally at ***in the external areas of the building***. No camera will be hidden from view. A list of locations is given at Appendix 1.
- 2.3 Signs will be prominently placed at strategic points and at entrance and exit points of the complex to inform staff, visitors, and members of the public that a CCTV installation is in use.
- 2.4 Although every effort has been made to ensure maximum effectiveness of the system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

3. Purpose of the system

- 3.1 The system has been installed by Grimsdyke School with the primary purpose of reducing the threat of crime generally, protecting Grimsdyke School premises and helping to ensure the safety of all Grimsdyke School staff and visitors consistent with respect for the individuals' privacy. These purposes will be achieved by monitoring the system to:
 - Deter those having criminal intent

- Assist in the prevention and detection of crime
- Facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order
- Facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against staff and assist in providing evidence to managers and/or to a member of staff against whom disciplinary or other action is, or is threatened to be taken.
- Facilitate the movement of vehicles on site.
- In the case of staff to provide management information relating to employee compliance with contracts of employment.

The system will not be used:

- To provide recorded images for the world-wide-web.
- To record sound other than in accordance with the policy on covert recording.
- For any automated decision taking

3.2 Covert recording

3.2.1 Covert cameras may be used under the following circumstances on the written authorisation or request of the DPO Mrs S Patel (School Business Manager) and where it has been assessed re: General Data Protection Regulations by the DPO

- That informing the individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording; and
- That there is reasonable cause to suspect that unauthorised or illegal activity is taking place or is about to take place.

3.2.2 Any such covert processing will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected unauthorised activity.

3.2.3 The decision to adopt covert recording will be fully documented and will set out how the decision to use covert recording was reached and by whom.

4. Monitoring of images

4.1 Images captured by the system will be recorded in the school office, twenty-four hours a day throughout the whole year. Monitors are sited *in the* school office and are not visible from outside the room.

4.2 No unauthorised access to school office will be permitted at any time. Access will be strictly limited to Senior Leadership Team, Site Supervisors and Admin Staff police officers and any other person with statutory powers of entry. A list of those members of staff authorised to access the Control Room is given at *Appendix 2*.

- 4.3 Staff, guests and visitors may be granted access to School Office on a case-by-case basis and only then on written authorisation from the DPO. In an emergency and where it is not reasonably practicable to secure prior authorisation, access may be granted to persons with a legitimate reason to enter School Office.
- 4.4 Before allowing access to School Office, staff will satisfy themselves of the identity of any visitor and that the visitor has appropriate authorisation. All visitors will be required to complete and sign the visitors' log, located School Office which shall include details of their name, their department or organisation they represent, the person who granted authorisation and the times of entry to and exit from the control room, this will also include any visitors granted emergency access. A similar rota will be kept of the staff on duty in the Control Room.

5. Staff

- 5.1 All staff working in the school office will be made aware of the sensitivity of handling CCTV images and recordings. The DPO will ensure that all staff are fully briefed and trained in respect of the functions, operational and administrative, arising from the use of CCTV.
- 5.2 Training in the requirements of the General Data Protection Regulations will be given to all those required to work in school office by the DPO.

6. Recording

- 6.1 Digital recordings are made using digital video recorders operating in time lapse mode. Incidents may be recorded in real time.
- 6.2 Images will normally be retained for a period of 30 working days from the date of recording, and then automatically over written and the Log updated accordingly. Once a hard drive has reached the end of its use it will be erased prior to disposal and the Log will be updated accordingly.
- 6.3 All hard drives and recorders shall remain the property of Grimsdyke School until disposal and destruction. Destruction will take place in the form of over writing the recording.

7. Access to images

- 7.1 All access to images will be recorded in an Access Log
- 7.2 Access to images will be restricted to those staff need to have access in accordance with the purposes of the system. A list of such staff is given at *Appendix 2*.
- 7.3 Access to images by third parties
 - 7.3.1 Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following authorities:
 - Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder

- Prosecution agencies
- Relevant legal representatives
- The media where the assistance of the general public is required in the identification of a victim of crime or the identification of a perpetrator of a crime
- People whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings.
- Emergency services in connection with the investigation of an accident.

7.4 Access to images by a subject

CCTV digital images, if they show a recognisable person, are personal data and are covered by the General Data Protection Regulations. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Regulations. They do not have the right of instant access.

- 7.4.1 A person whose image has been recorded and retained and who wishes access to the data must apply in writing to the DPO. Subject Access Request Forms are obtainable in hard copy at the reception at:

School Office, Grimsdyke School, Sylvia Avenue, Hatch End, Pinner, HA5 4QE

An electronic copy can be obtained via our website at www.grimsdyke.harrow.sch.uk. A response will be provided promptly and in any event within 1 month of receiving the request.

- 7.4.2 The General Data Protection Act gives the DPO the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.

7.4.3 If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing within 1 month, stating the reasons.

8. Complaints

- 8.1 It is recognised that some Data Subjects may have concerns or complaints about the operation of the system. Any complaint should be addressed in the first instance to the DPO dpo@grimsdyke.harrow.sch.uk. Concerns or enquiries relating to the provisions of the General Data Protection Regulations and/or The Data Protection Act 2018 may also be addressed to the DPO. These rights do not alter the existing rights of anyone under any relevant grievance or disciplinary procedures.

9. Data breach

- 9.1 A "Personal Data Breach" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed"

- 9.2 In the event that a data breach occurs, a thorough assessment of the breach will be made immediately by the Incident Response Team (IRT), comprised of the DPO as well as the (Mr I Sutherland) Headteacher, (Mr P Tidd) Deputy Headteacher and (Mrs G Curry) Assistant Headteacher.
- 9.3 Immediate steps will be taken to ensure that the breach is contained and the effects of the breach minimised and mitigated as much as possible.
- 9.4 If the data breach is deemed by the IRT to be reportable to the Information Commissioner's Office, the ICO will be notified within 72 hours of the discovery of the breach. The ICO can be informed via their website at: <https://ico.org.uk/for-organisations/report-a-breach/> or by telephone: **0303 123 1113**
- 9.5 In the case of a serious breach, Data Subjects whose data has been affected will be notified, in writing.

10. Compliance monitoring

- 10.1 The contact point for staff or members of the public wishing to enquire about the system will be the DPO by pre-arranged appointment.
- 10.2 Upon request enquirers will be provided with:
- A summary of this statement of policy
 - An access request form if required or requested
 - A subject access request form if required or requested
 - A copy of the Grimsdyke School complaints procedures
- 10.3 All documented procedures will be kept under review and a report periodically made to senior management.
- 10.4 The effectiveness of the system in meeting its purposes will be kept under review and reports submitted as required to senior management.

Appendix 1

Camera No.	Location	Type
1	<i>Front Entrance, Front Door</i>	<i>External (Dennard) – night vision</i>
2	Left Hand Car Park	External (Samsung) – night vision
3	Reception Area	Internal (Sanyo) – night vision
4	Main Entrance Gate	External (Dennard) – night vision
5	Right Hand Car Park	External (Nikvision) – night vision
6	KS2 Playground	External (Samsung) – night vision
7		
8		
9		
10		
11		
12		
13		
14		
15		

Appendix 2

Name	Job Title/Role	Contact Details	Email
Mr Ralph Swift	Site Supervisor	07786 530 542	Rswift4.310@lgflmail.org