



# Ballasalla Primary School

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Positive Relationships, Successful learners.



## CCTV Usage Policy

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## **Glossary**

For the purpose of this Policy, the following terms have the prescribed meanings:

**CCTV** means Closed-Circuit Television used to capture and record images of individuals and property.

**Commissioner** means the Isle of Man Information Commissioner.

**Data Protection Legislation** means:

- Data Protection Act 2018
- Data Protection (Application of GDPR) Order 2018;
- Data Protection (Application of LED) Order 2018; and
- GDPR and LED Implementing Regulations 2018

**Data Protection Officer (DPO)** means the Department of Education, Sport and Culture's Data Protection Officer.

**Department** means the Department of Education, Sport and Culture (DESC) including maintained and provided schools, UCM, Villa Gaiety and MSR.

**GDPR** means the General Data Protection Regulations.

**Technical Guidance** means the Commissioner's "Surveillance cameras: guidance for controllers".

**Visitor** means an individual who is visiting the school premises and is not employed to work there or is not a pupil there. A pupil who is suspended from the school for misbehaviour may also be referred to as a Visitor.

**DESC Data Protection Officer** DPO-desc@gov.im Tel: 698386 DPIA 0xx.23

## **1. Introduction**

1.1. Ballasalla Primary School ("the School") has installed a CCTV system to record individuals on and around the School's premises in order to maintain a safe environment for our pupils, staff and visitors.

1.2. Images of individuals recorded by CCTV cameras are personal data and are processed in accordance with the Data Protection Legislation.

1.3. The purpose of this Policy is to provide:

- The purpose for having CCTV cameras on the premises;
- The locations of the CCTV cameras on the premises;
- Guidelines for the use of the CCTV system; and
  - Contact details if you wish to discuss CCTV monitoring and/or access images/recordings.

## **2. Who is responsible for this policy**

2.1. For the purpose of the Data Protection Legislation, the Department is the Data Controller of the CCTV system, with Registration Number: R001501

2.2. The Headteacher has overall responsibility for the effective operation of the CCTV system and the implementation of this Policy.

2.3. Any questions with regard to the day-to-day operation of the system should be directed to The Headteacher in the first instance.

2.4. This Policy, along with the use of the CCTV system, will be kept under review and amended as and when required, in accordance with the Data Protection Legislation and Technical Guidance.

## **3. Purpose of cctv on the premises**

3.1. The school has identified the following reasons for installing the CCTV system on the premises:

- Protecting School and UCM assets, both during and after school hours, against theft or damage;
- Promoting the health and safety of staff, pupils and visitors;
- Safeguarding pupils;
- Monitoring student behaviour;
- Prevention of bullying;
- Detecting and identifying unauthorised persons;
- Reducing the incidence of crime and anti-social behaviour;
- Supporting the police to deter and detect crime;
- Assisting in identifying, apprehending and prosecuting offenders; and
- Assure that School and UCM rules are respected so that they can be properly managed.

\*This list is not exhaustive and other purposes may be or become relevant.

#### **4. Privacy impact assessments**

4.1. The use of the CCTV system has been subject to a Privacy Impact Assessment, performed by the Headteacher and signed-off by the DPO.

4.2. Where any changes are to be made to the CCTV system, including any updates or additional cameras, the Privacy Impact Assessment will be updated and signed-off by the DPO.

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#### **5. Location of cameras**

5.1. Cameras will be sited in specific locations relevant to the purposes for which they are installed and in compliance with Data Protection Legislation and Technical Guidance.

5.2. CCTV coverage is restricted to areas that are relevant to meeting the purpose of monitoring. These areas will include:

- School buildings/premises (internal and external);
- Car parks and public areas on the school premises;
  - Internal public areas, including corridors, foyers, and large rooms used for public gatherings.

5.3. Best efforts will be taken to avoid capturing public areas external to the school premises.

5.4. Due care is taken to uphold reasonable privacy expectations and it is the presumption that cameras will not be located in areas where individuals have such expectations, including:

- Offices;
- Meeting rooms;
- Classrooms;
- Changing rooms; and
- Toilets.

However, where there is reason to believe that criminal activity is taking place in these areas, the school may install CCTV cameras as a preventative measure against such behaviour.

#### **6. Cctv system overview**

6.1. To meet the School's stated purpose, the CCTV system is capable of recording 24 hours per day, 7 days a week.

6.2. Recorded images will only be accessed in response to a reported incident; they will not be accessed for monitoring purposes. Images will be retained for 30 days from the time of recording, unless the School is required otherwise by law and/or it is necessary for the school to retain recordings as part of an incident investigation. In the case of the latter, the relevant footage will be stored securely until it is no longer required for the purpose for which it was retained.

6.3. CCTV operating staff will be limited to a small number of individuals appointed by the Headteacher, who will be required to understand this Policy and Data Protection Policy when appointed. CCTV Operating Staff will also be given appropriate training to ensure they understand and observe the legal requirements related to the processing of relevant data.

6.4. In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure the Network based CCTV recorder on premises will be operated in a locked room with restricted access, and with password protection on the system to limit access to only approved personnel.

6.5. In order to inform people that they are under surveillance, the school will display clear CCTV signage appropriately in the locations wherein CCTV cameras have been positioned.

6.6. The School CCTV systems audio recording will be disabled as this may be considered intrusive and unnecessary in most circumstances and could thereby undermine support and confidence. Nor do the School CCTV systems have the ability for facial recognition.

## **7. REQUESTS FOR DISCLOSURE**

### **7.1. To Individuals**

7.1.1. Any request for images by an individual data subject which relate to themselves or a third party acting on their behalf, i.e. "Subject Access Requests" should be made directly to the School, marked for the attention of the Headteacher. Such requests will be processed in line with Data Protection Legislation. Identification and/or a sufficient 'form of authority' will be sought by the school upon receipt of such a request.

7.1.2. In order for the school to locate the relevant images, sufficient detail should be provided by the requester, such as date/location and time.

7.1.3. Where images include third parties, the school may not be in a position to release the image/footage where doing so would place them in breach of Data Protection Legislation. Requests will be processed on a case by case basis and the 'right of access' granted when appropriate.

### **7.2. To Third Parties**

7.2.1. CCTV footage will not be routinely shared with external agencies or bodies, whether statutory prosecution agencies, the judicial system, local government agencies, legal representatives, data subjects or other external bodies except upon receipt of a valid request. For example, it may be necessary for us to share recorded footage in limited circumstances such as where a law enforcement agency is investigating a crime. These images may be disclosed via viewing or by providing a copy of the images.

7.2.2. The School will consider all such requests in line with Data Protection Legislation and release images only where a relevant exemption to the Data Protection Legislation applies.

## **8. COMPLAINTS**

8.1. Any complaint regarding the School's CCTV will be dealt with in line with the Department's Complaints Policy, which is available at:

<https://www.gov.im/media/1381776/external-complaints-procedure-051023.pdf>

8.2. You have the right to make a complaint at any time to the Information Commissioner, the Isle of Man's supervisory authority for data protection issues. The Commissioner's contact details are as follows:

The Information Commissioner First Floor

Prospect House

Douglas

IM1 1ET

Tel: +44 1624 693260

Email: ask@inforights.im

Website: www.inforights.im

### **Version Control and Review**

<b>&lt;&lt;School&gt;&gt; Version</b>	<b>Revision Author</b>	<b>Sections Changed</b>	<b>Sign-off By</b>	<b>Date</b>
<b>V1.0</b>	<b>Jamie Cox</b>	<b>New Policy</b>	<b>Governing Body</b>	<b>March 25</b>
<b>V1.01</b>	<b>Jamie Cox</b>	<b>Reviewed as part of wider policy review – no amendments made apart from new cover sheet.</b>	<b>SLT</b>	<b>Oct 25</b>