



# Whitecross Nursery School

## CCTV Policy

Reviewed by	Kate Parker (School Business Manager)
Date of last review	January 2024
Date of next review	January 2026
Ratified by the Governing Body	March 2024

This policy will be reviewed sooner if there is a change to legislation or guidance which may affect it.  
Any changes will be communicated to all stakeholders.

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### Statement of intent

Whitecross Nursery School is fully committed to operating a safe environment. We therefore have in place a closed-circuit television (CCTV) system to assist in providing a safe and secure environment for children, parents, staff and visitors, as well as protecting school and nursery property.

### Legal Framework

CCTV Code of Practice 2008  
Data Protection Act 2018  
Section 115, Crime and Disorder Act 1998

There are two important points within the CCTV Code of Practice 2008 which are basic points of law that must be adhered to.

### CCTV Signs

CCTV signs are erected around the building within prominent locations that clearly identifies that CCTV recording is in operation. Signs are located in the main reception entrance to the school and in the park room window.

### The Data Protection Act 2018 and UK GDPR

The Data Protection Act 2018 relates to data processing of all types. The definition of data under the Act is "Personal data" means any information relating to an identified or identifiable living individual. It requires the person to be identified by a number of means, which can include photographic or video footage.

The definition of Processing is much wider in its scope than the previous legislation "Processing", in relation to information, means an operation or set of operations which is performed on information, or on sets of information, such as—

- (a) collection, recording, organisation, structuring or storage,
- (b) adaptation or alteration,
- (c) retrieval, consultation or use,

- (d) disclosure by transmission, dissemination or otherwise making available,
- (e) alignment or combination, or
- (f) restriction, erasure or destruction

Data in the case of CCTV recordings is in the form of recorded images of individuals that can be identified from these images.

Having regard for these definitions, it will be recognised that the use of CCTV for surveillance purposes is encompassed by the requirements of the Data Protection Act.

## **Objectives**

Operators of the system have access to a clear statement of the objectives of the system and responsibilities of those involved in its operation and management and to restrict unauthorised persons from gaining access to recorded images.

## **Confidentiality**

Operators of the system are aware of the need for confidentiality and that recorded information must be kept secure and available only to those directly connected with achieving the objectives of the system.

## **Copy Recordings**

Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation, or a valid Subject Access request. Copies are only issued by the system manager to those directly connected with achieving the objectives of the system. Appendix A can be utilised to assist in issuing recorded images to authorised agents such as the police.

## **Information Sharing (Section 115, Crime and Disorder Act 1998)**

The Crime and Disorder Act creates a power to share information from the System Owner/Operator to the Police and between the Police Forces, Police Authorities, Probation Committees, Local Authorities and Health Authorities.

The Data Protection Act 2018 also enables law enforcement agencies and statutory bodies to have access to information to enable them to prevent, detect and prosecute crimes, or to safeguard vulnerable adults and children.

## **Retention**

The archive period of recordings is no longer than is necessary to achieve the objectives of the system. The archive period is 30 days.

## **Erasure**

Digital recorders are set up in such a way as to overwrite old footage with new footage after the retention period has been reached.

## **Covert Recording**

Because fairness requires that we install signs to make individuals aware that they are entering an area where their images are recorded, it follows that failure to provide signs is a breach of the Data Protection Act.

## **Use of Recordings**

The CCTV recordings may be used for:

- Prevention and detection of crimes, in the school and its environs
- Pupil behaviour management, discipline and exclusions
- Staff disciplinary and associated processes and appeals

When using CCTV footage for any of the above purposes it shall be permissible to access and enable

relevant third parties to see the footage using a suitably secure device or media, subject to notification within Appendix A below.

## **Traceability and Record Keeping**

Any recorded images that are copied to a third-party data source, such as a video tape, CD or DVD recordings, are identified by a unique serial number indelibly marked on the body of the media. The unique identity of the recording is obviously compromised if it is applied only to the outer cover.

Recordings must be logged and traceable throughout their life within the system. If images are copied to a third-party media this is documented in Appendix A.

A routine audit is undertaken at regular intervals to ensure that recorded images are actually recording and that no fault exists with the recording system. The system is maintained by a maintenance company.

Original recordings are only found:

- a) Within the recognised secure storage system
- b) Operational in the recording device
- c) Secured in an evidence bag

Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation or a valid subject access request. Copies are only issued by the system manager to those directly connected with achieving the objectives of the system.

## **Time and Date Stamping**

The correct time and date is overlaid on the recorded image.

These date and time settings are checked and corrected as part of the routine maintenance visits.

## **Secure Storage of Recordings**

The recordings and recording/processing equipment are only accessible to those directly concerned with achieving the objectives of the system.

Recordings and Recording/Processing equipment are located in a secured lockable enclosure accessible only to authorised persons. A register of authorised users is maintained at all times.

## **CODE OF PRACTICE POLICY STATEMENT**

This code of practice policy statement relates to the Closed Circuit Television System installed within Whitecross nursery School.

The system manager is the Head Teacher of Whitecross Nursery School who has the overall responsibility of ensuring the management of the systems recorded images, maintenance and training of persons authorised to use the system and who has responsibility as Data Controller for the CCTV system.

Other authorised personnel trained to operate the system are:

School Business Manager  
Headteacher

The objectives of the system are:

- to assist in the detection of crime, provide evidence of crime and to deter those who have criminal intent
- to give confidence to staff and visitors that they are in a secure environment
- to provide management information relating to Health & Safety matters
- to support pupil behaviour and discipline management.
- to record actions of staff, pupils and school visitors that may be used for disciplinary or monitoring purposes

## System

The system comprises of the following primary items:

Recording media type	Digital Recorder DVR recording system		
The system records images from	Colour and Black and White cameras		
Monitors	1 monitor located in the school office		
Fixed cameras	5		
CCTV signs	2		

The operating manuals relating to the specific items of equipment have been compiled and are located in the respective main school office. It is the responsibility of **the Head Teacher** to ensure that all authorised staff are aware of the function of the system and capable of operating the system.

## General Principles

The principles detailed in the CCTV Code of Practice 2008 are observed in the operation and management of the system.

APPENDIX A

**SUBJECT ACCESS REQUEST**

Date of footage	
Start time of footage	
End time of footage	
Cameras of required footage	
Current time on recorder	
Time using speaking clock	
Person requesting footage	
Copy of footage has been recorded to DC/DVD/USB	
Serial number of copied media disk	

The above information and associated CCTV footage has been compiled on behalf of:  
Whitecross Nursery School

The footage detail above has been compiled in accordance with the CCTV code of practice 2008. It is the recipient's responsibility to store and dispose of the recorded media in accordance with the CCTV Code of Practice 2008 and the recipients take full responsibility for the safe keeping of the footage as detailed above. A copy of the codes can be obtained by visiting [www.ico.gov.uk](http://www.ico.gov.uk).

Whitecross Nursery School will maintain a log of access requests detailing who the requests have been made by.

**Issuer of the above footage**

Name	Signature	Date

**Recipient of the above footage**

Name	Signature	Date
Address		
Identification		