



FAIRFORD CHURCH OF ENGLAND PRIMARY SCHOOL

Isaiah 49:16 'I have written your name on the palms of my hands'.

Actively learning together in a safe, happy environment shaped by the certainty that each individual is loved and known by God.

Fairford C of E Primary School



Video Surveillance System Policy

Approved by the Resources Committee: November 2024

Approved by FGB December 2024

Date of next review: by Resources November 2025

Contents

1. Policy Statement	3
2. Introduction	3
3. Policy Legislation	3
4. Scope	3
5. Purpose of VSS.....	4
6. Siting of Cameras.....	4
7. Management and Access.....	4
8. Storage and retention of VSS footage	4
9. Disclosure of Images to Data Subjects	5
10. Disclosure of Images to Third Parties	5
11. Review of Policy.....	6
12. Misuse of VSS systems / Policy Breach.....	6
13 Complaints	6
14. Links to other policies.....	6

Vision and Values

Our school vision is: *Isaiah 49:16 "I have written your name on the palms of my hands"*.
Actively learning together in a safe, happy environment shaped by the certainty that each individual is known and loved by God.

At Fairford Primary School we have chosen those values that best reflect our thoughts as a school and community

Perseverance

Friendship

Respect

Forgiveness

Trust

Thankfulness

1. Policy Statement

The purpose of this policy is to set out the management, operation and use of the Video Surveillance System (VSS) at Fairford C of E Primary School.

2. Introduction

2.1 Fairford C of E Primary School uses VSS images to reduce the threat of crime generally, to protect our premises and to help to ensure the safety of all of our staff, pupils and visitors consistent with respect for the individuals' privacy. It also allows us to monitor access to the school via the school's two main entrances.

2.2 The system comprises fixed cameras located internally to provide coverage of the school's main school entrances, main corridors, including the rear corridor leading to Sunflowers, and the Sensory Room.

2.3 The system has sound recording capability.

3. Policy legislation

This policy takes account of all applicable legislation and guidance, including:

- UK General Data Protection Regulation ("GDPR")
- Data Protection Act 2018
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998
- Video Surveillance Guidance issued by the Information Commissioner

4. Scope

This policy applies to all staff, governors, contractors, agents, volunteers, representatives and temporary staff, working for or on behalf of the School.

5. Purpose of VSS

Fairford C of E Primary School uses VSS for the following purposes:

- to provide a safe and secure environment for pupils, staff and visitors;
- to prevent the loss of or damage to the school buildings and/or assets; and
- to assist in the prevention of crime and assist law enforcement agencies in apprehending Offenders.

6. Siting of Cameras

6.1 The VSS cameras will be sited in such a way as to meet the purpose for which the VSS is operated.

6.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance.

6.3 Fairford C of E Primary School will make all reasonable efforts to ensure that areas outside the school premises are not recorded.

6.4 Signs will be placed in prominent positions to inform individuals that they are in an area within which VSS is in operation.

7. Management and Access

7.1 The VSS system will be managed by the School's IT Manager.

7.2 Access to the system will be restricted to approved staff, authorised by the Headteacher as required to fulfil the duties of the school.

7.3 The VSS system will be checked weekly by School's IT Manager to ensure that it is operating effectively.

8. Storage and Retention of Images

8.2 Recorded images are stored only for a period of 31 days unless there is a specific purpose for which they are retained for a longer period.

8.3 Fairford C of E Primary School will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The VSS recording system is password protected; is located in a restricted access area and has measures to restrict copies being made.

8.4 The School's IT manager maintains a log of any access to the VSS images including the date and time when any individual logs into the VSS.

9. Disclosure of Images to Data Subjects

9.1 Any individual recorded in any VSS image is a data subject for the purposes of the Data Protection Legislation and has a right to request access to those images.

9.2 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the school's Data Protection Policy.

9.3 When such a request is made the School Business Manager and IT Manager will review the VSS footage, in respect of relevant time periods where appropriate, in accordance with the request.

9.4 If the footage contains only the individual making the request, then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The school will take appropriate measures to ensure that the footage is restricted in this way.

9.5. If the footage contains images of other individuals, then the school must consider whether:

- the request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
- the other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
- if not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

9.6 A record must be kept, and held securely, of all disclosures which sets out:

- when the request was made;
- the process followed by the School Business Manager and IT Manager in determining whether the images contained third parties;
- the considerations as to whether to allow access to those images;
- the individuals who were permitted to view the images and when; and
- whether a copy of the images was provided, and if so to whom, when and in what format.

10. Disclosure of Images to Third Parties

10.1 Fairford C of E Primary School will only disclose recorded VSS images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

10.2. VSS images will only be disclosed to law enforcement agencies in line with the purposes for which the VSS system is in place.

10.3 If a request is received from a law enforcement agency for disclosure of VSS images, then the school must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the VSS images for, and of any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed and the potential disclosure of any third party images.

10.4 The information referred to in paragraph 9.6 above must be recorded in relation to any disclosure pursuant to this paragraph 10.

10.5 If an order is granted by a Court for disclosure of VSS images then this should be complied with. Very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

11. Review of VSS Policy

This policy will be reviewed every year

12. Misuse of VSS systems / Policy Breach

12.1 The misuse of VSS system could constitute a criminal offence.

12.2 Any breach of this Policy by school staff or other person who is bound by this policy will be initially investigated by the Headteacher/Chair of Governors, in order for him/her to take the appropriate disciplinary action.

12.3 Any serious breach of the Policy will be immediately investigated and an independent investigation carried out to make recommendations as to how to remedy the breach.

13. Complaints and questions relating to this policy

13.1 Any complaints relating to this policy or to the VSS system operated by Fairford C of E Primary School should be made in accordance with the school's Complaints Policy.

If you have any questions regarding the content of this policy, please contact the school's Data Protection Officer (DPO), Gloucestershire County Council at schoolsdpo@gloucestershire.gov.uk.

14. Links to other policies

This policy should be read and construed in accordance with the following school policies:

- Data Protection and GDPR Policy;
- Online Safety and Acceptable Use Policy; and
- Freedom of Information Policy.