



Closed Circuit Television (CCTV) Policy

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Review Date: June 2026

Signed: _____ Chairperson schools governing body, on behalf of the governing body

Date: _____

Signed: _____ Headteacher

Distribution: Staff, governors, pupils, parents/carers and interested parties.

Policy for the use of CCTV and Use of Surveillance Cameras.

The United Nations Convention on the Rights of the Child (UNCRC) is the most complete statement of children's rights ever produced and is the most widely-ratified international human rights treaty in history. This policy relates to Article 16 of the UNCRC.

Article 16: Children have a right to privacy. The law should protect them from attacks against their way of life, their good name, their families and their homes.

Ysgol Ty Coch Special School is a Rights Respecting School.

As a Rights Respecting School, we aim to embed children's human rights in our ethos and school culture. We base our practice on the principles of equality, dignity, respect, non-discrimination and participation. Working within these principles not only empowers our children and young people, but also leads to enhanced learning, improved standards and better relationships.

The Information Commissioner's Office (ICO) issued its first code of practice under the Data Protection Act 1998(DPA) covering the use of CCTV in 2000. There has recently been a strengthening of the regulatory landscape through the passing of the Protection of Freedoms Act (POFA). The POFA has seen the introduction of a new surveillance camera code issued by the Secretary of State since June 2013 and also the Surveillance Camera Commissioner has been appointed to promote the code and review its operation and impact. The school organisation considers its obligations in relation to the Freedom of information Act 2000 (FOIA), the POFA, the Human Rights Act(HRA) and the Surveillance Camera Code of Practice.

This policy is in compliance with legislation as listed above and with General Data Protection Policy Regulations and the school GDPR. The General Data Protection Policy Regulations including the new Data Protection Act 2018 supersede the original Data Protection Act 1998.

This policy is issued by Ysgol Ty Coch Special School Governing Body. It is intended to provide guidance as to good practice for users of the CCTV (closed circuit television) systems at the school including the Tonteg and Buarth Y Capel sites.

This policy is based upon the Code of Practice published by the Information Commissioner, which set out the standards that must be met if the requirements of the Data Protection 2018 Act is to be met. These are listed below:

Data should be:

- fairly and lawfully processed
- processed for limited purposes and not in any manner incompatible with those purposes
- adequate, relevant and not excessive
- not kept for longer than is necessary
- processed in accordance with individuals' rights
- secure
- not transferred to countries without adequate protection

CCTV Systems

Owner, operator and data controller of the Scheme – the Headteacher

The schools considers that the CCTV system contributes to the security and the health and safety of pupils, staff and visitors.

The purposes of the CCTV system in the school are to provide monitoring systems to assist with the protection of the public property, law enforcement, traffic management, community safety, the reduction of crime and disorder; thereby improving the quality of life for the public in general.

The Information Commissioner's office has been notified of the CCTV systems in operation in the school. This includes disclosure of the registration number.

The general management of the Tonteg site is vested with the Site Manager Mr. Huw Bowen. The general management of the Buarth y Capel site is vested with the caretaker Mr David (Heath) Thomas.

The day-to-day management of the CCTV system will be the responsibility of the estates staff stated above.

The CCTV system is serviced annually by Brecongate in the Tonteg site and Tremorfa in the Buarth y Capel site .

Siting the Cameras

The Governing Body Buildings and Finance Committee has considered the proper location of CCTV cameras, where they exist, in and around the school.

The location of the cameras is based upon a variety of information including security and health and safety.

Standards

All such CCTV equipment installed in the school will only be sited in such a way that it only monitors those spaces that are intended to be covered by the equipment.

If images of areas not intended to be covered might be captured, then the users must consult with the owners of those areas.

Cameras that are adjustable by the operators will not be adjusted or manipulated by them to overlook spaces which are not intended to be covered by the system.

If it is not possible physically to restrict the equipment to avoid recording images from those spaces not intended to be covered by the system, then operators will be trained in recognising the privacy implications of such spaces being covered.

The operators will only use the equipment in order to achieve the purpose(s) for which it has been installed.

Notices

The employees and pupils will be made aware of the purpose(s) for which the system has been established and notices to this effect will be displayed in the school reception area and the school hall foyer.

Signs, of no less than the minimum standard will be placed so that the public are aware that they are entering a zone that is covered by CCTV.

The signs must be clearly visible and legible to members of the public.

The size of signs will vary according to circumstances.

The signs must contain the following information:

1. Identity of the person or organisation responsible for the system;
2. The purposes of the system;
3. Details of whom to contact regarding the system;
4. Any other information that may become a statutory requirement

Quality of Images

Standards

Upon installation, an initial check will be undertaken to ensure that the equipment performs properly. Regular checks will be made thereafter to ensure that the system is operating properly. The images are stored on the system hard drive and automatically delete after seven days.

Checks will be made to ensure the accuracy of any features such as the location of the camera and/or date and time reference. Where the time/date or other data is found to be out of sync with the current time/date, the operators will take such remedial action as is contained in the operations manual to correct the error. A note of such changes will be recorded.

Cameras are to be properly maintained and serviced to ensure that clear images are recorded. Servicing will be carried out annually.

Cameras should be protected from vandalism in order to ensure that they remain in working order.

A maintenance log will be kept in the monitoring centre of the system concerned.

The school's named estates staff will be responsible for:

- making arrangements for ensuring that a damaged camera is fixed
- ensuring that the camera is fixed within a specific time period
- monitoring the quality of the maintenance work

Processing the Images

Standards

1. Images should not be retained for longer than is necessary and unless required for specific investigation or evidential purposes, deleted after 7 days have passed.
2. Once the retention period has expired, the images will be removed or erased.
3. Images that are to be retained for evidential purposes will be retained in a secure place to which access is controlled.
4. Monitors displaying images from areas in which individuals would have an expectation of privacy should not be viewed or be capable of being viewed by anyone other than authorised persons.
5. Access to the recorded images should be restricted to a manager or designated member of staff who will decide whether to allow requests for Access. Designated managers operating across both sites are; David Jenkins (until 31.08.23 and thereafter Simon Wilson) Julia Render, Sarah Jones and Sean Gilbertson. Designated members of staff with permission to access recorded images are; Lyn Bundy/ Huw Bowen (Tonteg site) and Andrea Herman/ Heath Thomas(Buarth y Capel site). There should be two persons present, when accessing recorded images and the necessary form (appendix 1) should be completed.

6. Viewing of the recorded images should take place in a restricted area, for example, in the headteacher's office, Other employees should not be allowed to have access to that area when a viewing is taking place.
7. Removal of the medium on which images are recorded, for viewing purposes, should be documented as follows: (Appendix B)
 - the date and time of removal;
 - the name of the person removing the images; the name(s) of the person(s) viewing the images; the reason for the viewing;
 - the outcome, if any, of the viewing;
 - the date and time the images were returned to the system or secure place, if they have been retained for evidential purposes.
8. All operators and employees with access to images must be aware of the procedure that needs to be followed when accessing the recorded images.
9. All operators must receive training in line with the requirements of the Surveillance Camera Code of Practice.

Access to and disclosure of images to third parties

Standards

All employees should be aware of the restrictions set out in this code of practice in relation to access to, and disclosure of, recorded images.

Access to recorded images will be restricted to those persons who need to have access in order to achieve the purpose(s) of using the equipment.

All access to the medium on which the images are recorded must be documented.

Disclosure of the recorded images to third parties must only be made in limited and prescribed circumstances. Subject to the paragraph above, disclosure will be limited to the following classes of persons/agencies:

- Law enforcement agencies, where the images recorded would assist in a specific enquiry;
- Highways authorities in respect of traffic management matters; Law enforcement agencies where the images would assist a specific criminal enquiry;
- Prosecution Agencies;
- Relevant legal representatives

All requests for access or for disclosures must be recorded, if access or disclosure is denied, the reason will be documented.

If access to or disclosure of the images is allowed, then the following will be documented (Appendix C).

- The date and time at which access was allowed or the date on which disclosure was made;
- The identification of any third party who was allowed access or to whom disclosure was made;
- The reason for allowing access or disclosure; location of the images
- Any crime incident number to which images may be relevant
- Signature of person authorised to collect the medium – where appropriate.

Recorded images will not be made more widely available – for example they must not be made available to the media or placed on the internet.

Access by data subjects

Standards

In accordance with Chapter 3 of the Data Protection Act 2018 (Rights of Access), an individual who believes that their image has been captured by this system is entitled to make a written request to the Data Controller. Upon payment of the current fee*, and the supply of essential information, a systems search will be conducted and

subject to certain conditions, the individual will be allowed access to the personal data held.

*The current maximum fee is £10.00 and may be reviewed.

All subject access requests should be referred in the first instance to the Headteacher who will liaise with the Site Manager.

Requests for data will be provided with a standard subject access request form, a copy of this form is attached at Appendix D, which:

- indicates the information required in order to locate the images requested;
- indicates the information required in order to identify the person making the request;
- indicates the fee that will be charged for carrying out the search for the images requested.

NB. The above form will also enquire whether the individual would be satisfied with merely viewing the images recorded. The form will also indicate that the response will be provided promptly and in any event within 28 days of receiving the request.

Individuals, at the time of any subject access request, will be given a description of the type of images recorded and retained and the purpose for which the recording and retention has taken place. They should be informed of their rights as provided by the 2018 Act.

Prior to any authorised disclosure, the Headteacher will need to determine:

- whether the images of another “third party” individual, features in the personal data being applied for and whether these third party images are held under a duty of confidence,
- if third party images are not to be disclosed, the System Manager shall arrange for the third party images to be disguised or blurred,

- if the Headteacher decides that a subject access request from an individual is not to be granted, the following should be documented:
 1. The identity of the individual making the request
 2. The date of the request
 3. The reason for refusing to supply the images requested
 4. The name and signature of the person making the decision

Other rights

Under the General Data Protection Regulation Policy 2018 (GDPR) and Data Protection Act 2018, individuals also have the following rights which may be applicable to CCTV schemes:

- Right to prevent processing likely to cause damage or distress;
- Rights in relation to automated decision taking;
- Right to seek compensation for failure to comply with certain requirements.

Where a request is made in relation to other rights, these shall be referred to the Headteacher who will document the request and respond to it.

Monitoring Compliance with this Policy

Enquirers should be provided on request with one or more of the following:

- a copy of this policy;
- a subject access request form if required or requested (Appendix D)
- the complaints procedure if they have concerns about the use of the system.

An internal annual assessment should be undertaken which evaluates the effectiveness of the system by the Site Manager/ Caretaker.

Any complaints will be dealt with in line with the agreed Complaints Policy.

The Complaints Procedure may be accessed on the school's website and a hard copy will be made available on request to the school.

Use of Drones

A drone is an unmanned aircraft. The Air Navigation Order 2016 (ANO) defines "small unmanned aircraft" (SUA) as "any unmanned aircraft, other than a balloon or a kite, having a mass of not more than 20kg without its fuel but including any articles or equipment installed in or attached to the aircraft at the commencement of its flight."

Typically, an unmanned aircraft will be controlled by a ground based remote pilot, with a communications system linking the two. This is collectively referred to as an Unmanned Aircraft System (UAS).

The school is compliant with government legislation regarding the use of drones, including the new amendment to the Air Navigation Order 2016 which states that there is:

1. a height restriction on all small drones
2. a 1km restriction on all small drone flights around protected aerodromes
3. a registration scheme for operators of small drones of a mass between 250g and 1kg
4. a competence requirement for remote pilots of small drones of a mass between 250g and 20kg inclusive.

The ANO requires small drone pilots to maintain direct, unaided visual contact with their drone and that any person must not recklessly or negligently cause or permit their aircraft to endanger any person or property. A small drone remote pilot must only fly the aircraft if reasonably satisfied that the flight can safely be made.

If a small drone is equipped with a camera then it is mandatory that the remote pilot must not fly their small drone within 50m of a person, vehicle or building and must

also avoid flying over or within 150m of densely populated areas. Any photographs taken by a camera on a drone must also be in compliance with the rest of this policy.

The school has three drones, two of the drones are extremely small and weigh less than 250g.

The school is registered with the UK Civil Aviation as an Operator of Drone and Model Aircraft. Christopher Myhill is registered as the Operator and his Flyer ID expires on 21/10/2026. If staff want to fly the drone they must be registered with the Aviation Authority for a Flyer ID. The register of this is kept with Andrea Herman.

Equal Opportunities

The school operates a policy of equality for all pupils regardless of gender, ethnicity, religious beliefs or culture.

Pupils identified as Children Looked After (CLA), More Able and Talented (MAT) and those on the child protection register are supported in line with their particular needs to afford them equal access to the curriculum.

Safeguarding

The Safeguarding of pupils is of paramount importance. The school understands its duty to keep learners safe and adheres to the PREVENT agenda and broader safeguarding guidelines.

Health and Safety

The school follows the recommendations in the Local Authority's (LA) and school governing body's Health and Safety Policies. Staff accept the responsibility to plan safe experiences and to match the level of adult supervision and support to the degree of risk involved as determined by the dynamic risk assessment. This includes risk assessing vocational learning opportunities. Any specific issues relating to Health and Safety that require immediate attention must be brought to the attention of the Head teacher, Curriculum co-ordinator and the Health and Safety Officer.

Staff Development

Staff will have access to in-service training as and when appropriate. This is in accordance with the school's policy for staff development. Any new developments in the use of surveillance cameras and CCTV will be disseminated to the relevant people throughout the year.

Role of the Head teacher

- To discuss future developments for CCTV and surveillance management
 - Facilitate training and guidance on complying with CCTV policy
 - Develop and implementing the CCTV and surveillance policy
 - Take a lead role in investigating any reported incidents.
 - Make an initial assessment when an incident is reported and involving appropriate staff and external agencies as required.
 - Ensure budget provision for maintaining equipment
 - Ensure budget provision for staff training

Links to Other Policies

- Safeguarding
- Management of Health and Safety at Work
- Password Management
- Physical Security
- Preventing Extremism
- GDPR

Appendix A

Guiding Principles of the Surveillance Camera Code of Practice (2013)

System operators should adopt the following 12 guiding principles:

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.

6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.

Appendix B

CCTV – Ysgol Ty Coch

Recording of Viewing by Authorised School Staff

Name :	
Designation:	
Name:	
Designation:	
Date :	
Time:	
Reason for Viewing:	
Outcome if any of the Viewing:	

Date and Time the Viewing was Completed:

Appendix C



CCTV – Ysgol Ty Coch Recording of Viewing by a Third Party (e.g. Police)

Name of School Staff Present :	
Designation:	
Name of Third Party:	
Designation:	
Date :	
Time:	
Reason for Allowing Access:	

Crime Incident number(if applicable)	
Location of Images	
Signature of the Person Authorised to Collect the Medium:	
Date and Time the Viewing was Returned to the System or if Retained for Evidential Purposes:	



Appendix D

CCTV – Ysgol Ty Coch Form to Request access to CCTV Images- Fee £10.00

To carry out a search for the images, a fee of £10.00 will be charged.

Please complete the above form and attach a £10.00 cheque made payable to Ysgol Ty Coch.

The Headteacher will consider the request and respond within 28 days.

Name:	
Address:	
Date of Birth :	
Telephone Number:	
Date Image Recorded:	
Time Image Recorded:	
Location:	