

# *Ysgol Hendrefelin*



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## CCTV Policy

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### ***MONITORING AND EVALUATION OF POLICY***

<b><i>Policy Type:</i></b>	<i>Corporate</i>
<b><i>Review Cycle:</i></b>	<i>3 years</i>
<b><i>Last Review</i></b>	<i>April 2025</i>

## **Statement from the Governing Body of Ysgol Hendrefelin:**

This policy is a corporate policy and as such has been provided by the Local Authority / Welsh Government.

All relevant departments/personnel, including legal and employee union representatives have been involved in the production and consultation of this document. The content, therefore, has been accepted in its entirety and not altered (apart from personalisation to the school name/detail where appropriate), by the governing body of Ysgol Hendrefelin.

Ysgol Hendrefelin and its Governing body will regularly review this policy in accordance with its agreed review cycle and will accept the latest available version of this policy from NPTCBC's intranet or as advised. The Governing Body of Ysgol Hendrefelin have no control over the review date / version of this policy and have therefore agreed to retain the HR / LA cover when displaying or making available this policy any stakeholder of Ysgol Hendrefelin, to ensure full transparency.

This policy has been accepted in the format it was received with regards to font, text size etc so may look slightly different to Ysgol Hendrefelin's school-based policies.

Unless otherwise stated this policy applies to Ysgol Hendrefelin's residential unit as well as the main school.

Senior Management of Ysgol Hendrefelin will ensure that any necessary training will be provided to staff and refreshed as and when required.



# **Ysgol Hendrefelin**

## **CCTV Policy**

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## 1 Introduction

The purpose of this Policy is to regulate the management, operation, and use of the closed-circuit television (CCTV) system at Ysgol Hendrefelin. The systems will not be used for any other purpose other than those set out in this document without prior consultation with the Head Teacher, and where appropriate, notification to staff.

The policy applies to all members of staff, pupils and visitors to Ysgol Hendrefelin and any other persons whose images may be captured on the CCTV system.

Ysgol Hendrefelin use CCTV for the purpose of providing a safe and secure environment and to protect school buildings and assets. CCTV operation is subject to the procedures set out in this policy and takes account of all applicable legislation and guidance, including:

- UK General Data Protection Regulation ("UK GDPR")
- Data Protection Act 2018
- Protection of Freedoms Act 2012
- Human Rights Act 1998

At Ysgol Hendrefelin, all cameras are fixed. Images from all cameras are presented, monitored, and recorded in the main office in a suitably secure manner, to which access is restricted. There are no recording facilities at any location other than the School's main resource office.

## 2 Objectives of the CCTV Policy

This policy covers the use of CCTV systems on all of Ysgol Hendrefelin's school sites; Bryncoch, Velindre and Theodore Road which capture moving and still images of people who could be identified, for the following purposes.

- to support safeguarding
- to protect pupils, staff, and visitors
- to assist in managing the school
- to help deter crime and anti-social behaviour
- to assist in managing the school
- to assist in supporting civil proceedings which will help to detect and deter crime
- to support the police in preventing and detecting crime
- protect school assets and buildings

### **3 Statement of Intent**

Ysgol Hendrefelin will treat the system, and all information, documents and recordings obtained and used as data, which are protected by the UK GDPR, and will be processed in accordance with the requirements of the regulation.

Cameras will be used to monitor activities within allocated areas around the school sites; to identify criminal activity occurring, anticipated or perceived, and to ensure the safety and wellbeing of the school community.

Ysgol Hendrefelin will only operate overt surveillance and will display signs in the areas of the school where this is in operation. Covert surveillance (i.e. which is intentionally not shared with the individuals being recorded) is not condoned by the school.

Warning signs, have been placed at all access routes to areas covered by the school CCTV, as required by the Code of Practice of the Information Commissioner.

The CCTV system will not be trained on individuals unless an immediate response to an incident is required. The CCTV system will not be trained on private vehicles or property outside the perimeter of the school

### **4 General Principles of Operation**

At Ysgol Hendrefelin the CCTV System will be operated in accordance with all the requirements and the principles of the Human Rights Act 1998.

At Ysgol Hendrefelin the CCTV System will be operated in accordance with the Data Protection Act 2018 at all times.

At Ysgol Hendrefelin the CCTV System will be operated fairly, within the law, and only for the purposes for which it was established and are identified within, or which are subsequently agreed, in accordance with this Policy.

At Ysgol Hendrefelin the CCTV System will be operated with due regard to the principle that everyone has the right to respect for his or her private and family life and their home.

The public interest in the operation of the CCTV System will be recognised by ensuring the security and integrity of operational procedures.

Throughout this Policy it is intended, as far as reasonably possible, to balance the objectives of the CCTV System with the need to safeguard the individual's rights. Every effort has been made throughout the Policy to indicate that a formal structure has been

put in place, including a complaints procedure, by which it can be identified that the CCTV System is not only accountable, but is seen to be accountable.

Participation in the CCTV System by any organisation, individual or authority assumes an agreement by all such participants to comply fully with and be accountable under this Policy.

## **5 Cameras and Area Coverage**

The areas covered by CCTV to which this Policy refers are located in and around each site that form Ysgol Hendrefelin, including classrooms, corridors & outdoor areas.

## **6 Monitoring and Recording Facilities**

At Ysgol Hendrefelin, CCTV footage will be retained for 31 days. At the end of the retention period, the files will be overwritten automatically.

On occasion footage may be retained for longer than 31 days, for example where a law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation.

Recordings will be downloaded and encrypted, so that the data will be secure, and its integrity maintained, so that it can be used as evidence if required.

The system manager will conduct termly checks to determine whether footage is being stored accurately and being deleted after the retention period.

## **7 Control and Operation of Cameras**

Any person operating the cameras at Ysgol Hendrefelin will act with utmost probity at all times.

The cameras, control equipment, recording and reviewing equipment shall at all times only be operated by persons who have been trained in their use and the legislative implications of their use.

Every use of the cameras will accord with the purposes and objectives of the system and shall be in compliance with this Code.

Only those trained and authorised members of staff with responsibility for using the CCTV equipment will have access to the operating controls.

To ensure compliance with the Information Commissioners Code of Practice and that images recorded continue to be of appropriate evidential quality, the CCTV System in all sites of Ysgol Hendrefelin shall be maintained regularly.

The maintenance will include regular periodic overhaul of all the equipment and replacement of equipment which is reaching the end of its serviceable life

It is the responsibility of the Headteacher to ensure appropriate records are maintained in respect of the functioning of the cameras and the response of the maintenance organisation.

## **8 Access to, and Security of Control Room and Associated Equipment**

At Ysgol Hendrefelin, only trained and authorised personnel will operate any of the equipment located within the main offices or other equipment associated with the CCTV System.

Public access to the Control Room will be prohibited except for lawful, proper, and sufficient reasons and only then with the personal authority of the System Manager.

## **9 Management of Recorded Material**

For the purposes of this Policy 'recorded material' means any material recorded by, or as the result of, equipment which forms part of the CCTV System, but specifically includes images recorded digitally, or on CD, DVD or by way of video copying, including still prints.

At Ysgol Hendrefelin, we want to ensure staff and pupils have total confidence that information recorded by virtue of the CCTV System, will be treated with due regard to their individual right to respect.

It is therefore of the utmost importance that irrespective of the format (e.g. paper copy, CD, DVD, or any form of electronic processing and storage) of the images obtained from the system, they are treated strictly in accordance with this Policy from the moment they are received until final destruction. Every movement and usage will be meticulously recorded.

Access to and the use of recorded material will only be strictly for the purposes defined in this Policy.

At Ysgol Hendrefelin recorded material will only be used in pursuance of preventing, identifying, or detecting safeguarding issues, crime, or anti-social behaviour. At the

specific and written request of a police officer, copies of recorded images may be produced for the purpose of identifying criminals or potential witnesses through the media. Specific details of the media to be used must be stated in the written request.

Recorded material will not be copied, sold, otherwise released, or used for commercial purposes or for the provision of entertainment. Recorded material will not be made available on the internet.

Every request for the release of personal data generated by the CCTV System will in the first instance be directed to the Headteacher for consideration and decision.

Any disclosure of CCTV images to third parties, without the consent of the individual whose images are being disclosed, is a breach of the Data Protection Act 2018. Therefore, the Ysgol Hendrefelin will only comply with a request for disclosure by a third party if such disclosure can be justified under the Act.

A justification for making a disclosure may be found in the statutory provision under which the request for disclosure is made. The third-party requesting disclosure must therefore quote the legislation and section number under which it is making the request. This should be in writing and signed by a senior officer of the third-party organisation.

Under Schedule 2, Part 1 (2) of the Data Protection Act 2018, a third party may request disclosure of the recorded images if this is required for the purpose of preventing or detecting crime, apprehending, or prosecuting offenders or assessing or collecting tax. The School must ask the third party to justify its request for the images and to confirm that a failure to make the disclosure would be likely to prejudice any of these matters. If the request appears to be justified, the School may decide to disclose the images. This decision must be on a case-by-case basis and be fully documented and kept on the relevant file.

If the third party making the request for disclosure quotes a statutory provision (other than the Data Protection Act 2018) which places a mandatory duty on Ysgol Hendrefelin to disclose the images, then Ysgol Hendrefelin has no choice but to make the disclosure. If the provision states that disclosure is discretionary, the decision as to whether to disclose will be decided at the Headteachers discretion.

Disclosure of recorded material to Police Officers will only be for the purpose of the prevention or detection of crime or anti-social behaviour and the prosecution of offenders.

## **10 Assessment of the System and Code of Practice**

At Ysgol Hendrefelin, the CCTV System will periodically be evaluated to establish whether the purposes of the system are being complied with and whether objectives are being achieved. The evaluation will include:

- An assessment of the impact of the CCTV System
- An assessment of the incidents monitored by the equipment
- An assessment of neighbouring areas without CCTV
- The views and opinions of the pupils and staff
- The operation of the Code of Practice
- Whether the purposes for which the system was established are still relevant
- Cost effectiveness

The results of the evaluation will be used to review and develop any alterations to the specified purpose and objectives of the scheme as well as the functioning management and operation of the system.

The Headteacher of Ysgol Hendrefelin has day to day responsibility for the monitoring, operation and evaluation of the system and the implementation of this Code.

The Headteacher is also responsible for maintaining full management information as to the incidents dealt with by the Control Room, for use in the management of the system and future evaluations.

## **11 Privacy and Data Protection**

At Ysgol Hendrefelin, all personal data obtained by virtue of the CCTV System, shall be processed fairly and lawfully, and shall only be processed in the exercise of achieving the stated objectives of the system. In processing personal data there will be total respect for everyone's right to respect for his or her private and family life and their home.

At Ysgol Hendrefelin, the storage and security of the data will be in accordance with the requirements of the Data Protection Act 2018.

The operation of the CCTV System has been notified to the Office of the Information Commissioner in accordance with the current Data Protection legislation.

Ysgol Hendrefelin is the 'data controller' for the CCTV system, day to day responsibility for the data is devolved to the Headteacher.

At Ysgol Hendrefelin, all data will be processed in accordance with the principles of the Data Protection Act, 2018 which, in summarised form, includes, but is not limited to:

- processed fairly, lawfully and in a transparent manner
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed
- accurate and, where necessary, kept up to date
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed which the data are held.
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures

## **12 Access by Data Subjects (Subject Access Requests)**

According to UK GDPR and Data Protection Act 2018, individuals have the right to request a copy of any CCTV footage of themselves.

Upon receiving the request, Ysgol Hendrefelin will immediately issue a receipt and will then respond within a calendar month during term time. Ysgol Hendrefelin reserves the right to extend that deadline during holidays due to difficulties accessing appropriate staff members.

All staff have received training to recognise SARs. When a SAR is received staff should inform the DPO in writing. When making a request, individuals should provide Ysgol Hendrefelin with reasonable information such as the date, time, and location the footage was taken to aid school staff in locating the footage.

Ysgol Hendrefelin reserve the right to refuse a SAR, if, for example, the release of the footage to the subject would prejudice an ongoing investigation.

Images that may identify other individuals need to be obscured to prevent unwarranted identification. Ysgol Hendrefelin do not have the technology to conceal their identities by blurring out their faces, or redacting parts of the footage. Therefore, in most cases footage will not be released unless it is requested by the police, or they are instructed by the ICO. If

Ysgol Hendrefelin reserves the right to charge a reasonable fee to cover the administrative costs of complying with an SAR that is repetitive, unfounded, or excessive.

Footage that is disclosed in a SAR will be disclosed securely to ensure only the intended recipient has access to it.

Ysgol Hendrefelin will retain records that show the date of the disclosure, details of who was provided with the information (the name of the person and the organisation they represent), and why they required it.

Individuals wishing to make an SAR can find more information about their rights, the process of making a request, and what to do if they are dissatisfied with the response to the request on the [ICO website](#).

## **13 Complaints**

A member of the public wishing to register a complaint regarding any aspect of the CCTV System at Ysgol Hendrefelin may do so by contacting the Headteacher. All complaints shall be dealt with in accordance with School's complaints procedure, a copy of which may be obtained from the School's Offices. Any performance issues identified will be considered under Ysgol Hendrefelin's disciplinary procedures, to which all School employees, including CCTV personnel, are subject

## **14 Public Information**

Wherever cameras are installed appropriate signage is in place to warn members of the Ysgol Hendrefelin community that they are under surveillance. The signage:

- Identifies the school as the operator of the CCTV system
- Identifies the school as the data controller
- Provides contact details for the school

Cameras are not and will not be aimed off school grounds into public spaces or people's private property.

Cameras are positioned in order to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

**Policy Review Record:**

Policy Adoption and Review Dates		Signature	Signature
Date approved by Governors	08/04/2025	Mr R. Blank (Chair of Governors)	Mr L. Lewis (Headteacher)

