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PRIMARY SCHOOL WALVIS BAY (Incorporated association not for gain) 21/95/0111

WALVIS BAY PRIMARY SCHOOL CCTV POLICY

INTRODUCTION

The use of closed-circuit television in schools has increased significantly in recent years and has become more extensive and intrusive. While the use of such surveillance may be perceived as a positive measure to help enhance security, CCTV cameras can also lead to a climate of paranoia among learners and staff, especially if prior consultation has been inadequate.

PURPOSE

This policy is designed to demonstrate transparency relating to the use of CCTV in school and outline the school's obligations when operating CCTV systems.

LEGAL REQUIREMENTS

Personal data gathered in this way can only be processed under certain very specific circumstances enumerated by the law.

CONSIDERATIONS

School has completed the following in relation to the use of CCTV cameras in school:

- Sought advice from the Board of Directors team on the use and location of CCTV cameras.
- Considered whether there are other solutions to the problems the school wishes to address with CCTV and whether these are more appropriate and justified using CCTV and the locations.

THE CCTV SYSTEM

- The system comprises of 23 fixed cameras.
- The system has sound recording capability.
- The CCTV system is owned and operated by the school, the deployment of which is determined by the school's management team.
- CCTV advisory signs will be clearly and prominently placed.
- The CCTV is monitored centrally from the school offices by the School Director and the Head of Disciplinary Committee.
- Changes to CCTV monitoring will be subject to consultation with staff and the school community.
- All authorized operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound.
- All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

ACCESS TO CCTV FOOTAGE

- Access to recorded images will be restricted to those staff authorized to view them and will not be made more widely available.
- The initial viewing of live and recorded images of CCTV within Walvis Bay Primary School is restricted to the School Director only and/or the appropriate trained staff member to cover any absence. Any recorded images are viewed in a restricted area, the School Director's office where the content cannot be seen from the outside.

STORAGE AND RETENTION OF CCTV IMAGES

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. All retained data will be stored securely. The retention period for stored images recorded by Walvis Bay Primary School CCTV system is 30 days.

For all data that is retained for possible future viewing, a register is be maintained, detailing relevant information such as date, time and length of the original recording, as well as the locations covered and groups or individuals recorded. Reviews of stored images should be regularly conducted, so that obsolete stored material can be deleted securely.

SUBJECT ACCESS REQUESTS FOR CCTV IMAGES

Individuals have the right to request access to CCTV footage relating to them. All requests should be made in writing to the School Director.

Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. (e.g. date, time and location).

The school will respond to requests within 21 days of receiving the written request. The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardize an on-going investigation. There will be no disclosure of recorded data to third parties other than to authorized personnel such as the Police and other Service Providers where legislation dictates.

COMPLAINTS

Complaints and enquiries about the operation of CCTV within Walvis Bay Primary School should be directed to the School Director in the first instance.