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# Arlo Video Doorbell Camera Policy

Charlesworth VC Primary School

Version 1

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<b>Last Reviewed</b>	<b>7<sup>th</sup> November 2024</b>
<b>Reviewed By (Name)</b>	<b>Philip Whiston</b>
<b>Job Role</b>	<b>Headteacher</b>
<b>Next Review Date</b>	<b>7<sup>th</sup> November 2025</b>
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This document will be reviewed annually and sooner when significant changes are made to the law.

Guidance from the Department for Education about school policies can be found here:

<https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts>

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## 1. Introduction

1.1.1 The purpose of this Policy is to regulate the management, operation and use of the Arlo Video Doorbell Camera System at Charlesworth VC Primary School

1.1.2 The system comprises a number of fixed video doorbells located at the entrance doors to both school sites. All Arlo Video Doorbell recorders are password protected and monitoring is only available to authorised staff.

1.1.3 This Policy follows Data Protection guidelines, including guidance from the Information Commissioner's Office and the Surveillance Camera Commissioner.

1.1.4 The Arlo Video Doorbell Camera System is owned by the school.

1.1.5 Authorised Staff

- Headteacher
- Senior Leadership Team Members
- Senior Business Assistant

## 2. Purposes of the Arlo video doorbell camera scheme

- 1.2.1
- (a) To protect the school buildings and their assets
  - (b) To increase personal safety and reduce the fear of crime
  - (c) To support the Police in a bid to deter and detect crime
  - (d) To assist in identifying, apprehending and prosecuting offenders
  - (e) To assist with the safeguarding and supervision of pupils

1.2.2 The school has identified the following legal bases for processing Arlo Video Doorbell Camera footage which will include personal data; UK GDPR Article 6(1)e (public task) and Article 9(2)(g) (substantial public interest) and Data Protection Act 2018 Schedule 1, paragraph 10 (preventing or detecting unlawful acts) and paragraph 36 processing criminal category data for purposes of substantial public interest.

## 3. Statement of intent

1.3.1 The School will seek to comply with the requirements of the Data Protection Act ("the Act"), the Information Commissioner's Guidance on Video Surveillance and the Surveillance Camera Commissioner's Code of Practice.

1.3.2 The School will treat the system and all information, documents and recordings obtained and used as personal data which are protected by the Act.

1.3.3 The Arlo Video Doorbell Camera System will be used to monitor activities within the school to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of members of the school community and members of the public.

1.3.4 Materials or knowledge obtained as a result of the Arlo Video Doorbell Camera System will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Recordings will never be released to the media for purposes of entertainment.

1.3.5 The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

1.3.6 The Arlo Video Doorbell Camera System will not record any private premises.

1.3.7 Signs that inform people of the existence of the Arlo Video Doorbell Camera System, as required by the Code of Practice of the Information Commissioner have been placed at access routes to areas covered by the school Arlo Video Doorbell Camera System.

1.3.8 A log is kept of Authorised Staff access to Recorded Images (template below)

## 4. Operation of and Access to the system

1.4.1 The Scheme is administered and managed by the Headteacher, in accordance with the principles and objectives expressed in this policy.

1.4.2 Images can be accessed on the screen in the school office, and is password protected.

1.4.3 Live feeds are available from the Arlo Video Doorbell Camera Live feeds are available to authorised staff for the management of the school, security of the site and safety of staff and pupils.

1.4.4 The Arlo Video Doorbell Camera System will be operated 24 hours each day, every day of the year.

1.4.5 Arlo Video Doorbell Camera System recordings will be available for 90 days unless copied to removable media (CDs,DVDs or Tapes etc). After this time any recordings will be automatically overwritten. Where the Arlo Video Doorbell Camera System is copied to be retained for longer periods this will be documented and justified in the Access Log. In this case, the footage will be held in accordance with the School Retention Schedule.

## 5. Printed and Recording Media Procedures

1.5.1 In the event of an incident requiring footage from the system to be retrieved and stored the following procedure should be followed:-

- The details of the incident should be passed to the Headteacher, who will authorise the use of the system by an authorised user.
- The relevant footage will be identified.
- An entry shall be made on the Recorded Image Viewing Log.
- If the footage is required for investigation then the User will produce a copy. The Date and Time of the recorded extract will be registered and stored in a secure place.
- The footage may only be viewed by Authorised Staff.
- A record of all viewings shall be made, which if required as evidence, may be released to the Police.
- Applications received from outside bodies or Subject Access Requests to view or release records will be notified to the Headteacher.

## 6. Assessment of the System

1.6.1 The School Business Assistant will check and confirm Arlo video doorbell cameras are working weekly.

1.6.2 Regular reviews of the system's operation will take place and any necessary changes in procedure and camera sighting/position will be implemented.

1.6.3 The Headteacher and DPO will carry out an annual review of the use of the Arlo Video Doorbell Camera System, using the Annual Review Checklist below.

1.6.4 The school will carry out a Data Protection Impact Assessment to review the use of the Arlo Video Doorbell Camera System whenever there is any significant change to the use of the system or the purpose for which is it used.

1.6.4 If out of hours emergency maintenance arises, the Headteacher, Site Manager or School Business Assistant must be satisfied of the identity and purpose of contractors before allowing entry.

## 7. Breaches of the policy (including breaches of security)

1.7.1 Any breach of this Policy by school staff will be initially investigated by the Headteacher, in order for him/her to take the appropriate disciplinary action.

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

## 8. Complaints

1.8.1 Any complaints about the school's Arlo Video Doorbell Camera System should be addressed to the Headteacher.

1.8.2 Complaints will be investigated in accordance with the school's complaint Policy.

## 9. Access by the Data Subject

1.9.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to access copies of data held about themselves, including those obtained by the Arlo Video Doorbell Camera System.

1.9.2 Requests for Data Subject Access should be made in accordance with the Subject Access Request Procedure.

Annexe 1 Arlo Video Doorbell Camera System Annual Review Form

ARLO VIDEO DOORBELL CAMERA SYSTEM ANNUAL REVIEW				
<b>School:</b>	Charlesworth VC Primary School	<b>Date:</b>		
<b>Reviewed by:</b>	Philip Whiston	<b>Signed:</b>		
Review Statement	Satisfactory		Problems Identified?	Corrective Action Required (if relevant)
	Yes	No		
The School is registered with the Information Commissioner’s Office and the next renewal date recorded.				
There is a named individual who is responsible for operation of the system.				
The problem we are trying to address has been clearly defined and installing cameras is the best solution.				
The Arlo Video Doorbell Camera System is addressing the needs and delivering the benefits that justified its use.				
The system equipment produces clear images which the police can use to investigate crime and these can easily be taken from the system when required.				
Cameras have been sited so that they provide clear images.				
Cameras have been positioned to avoid capturing images of people who are not visiting the premises.				
There is sufficient suitable signage notifying people that Arlo video doorbell camera monitoring is in operation, including our contact details where it might not be obvious that the system is managed by this school.				
Information is available to help deal with queries about operation of the system and how individuals can make access requests.				
Sufficient safeguards are in place to protect wireless transmission systems from interception.				
There are sufficient controls and safeguards in place if the system is connected to, or made available across, a computer, e.g. an intranet.				

Review Statement	Satisfactory		Problems Identified?	Corrective Action Required (if relevant)
	Yes	No		
Images from this Arlo Video Doorbell Camera System are securely stored, where only a limited number of authorised persons may have access to				
Recorded data will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.				
The process for deleting data is effective and being adhered to.				
Except under the direction of an appropriate public authority (usually police), images will not be provided to third parties, unless the Headteacher has approved the disclosure of the data under the advice of the DPO.				
When information is disclosed, it is transmitted as securely as possible e.g. viewed on school premises, hand delivered/collected in person on a device, a fully tracked postal service etc.				
Staff are trained in security procedures and there are sanctions in place for any misuse of surveillance system information.				
Regular checks are carried out to ensure that the system is working properly and produces high quality and useful data.				
There is a system in place to ensure that any manufacturer recommended Arlo Video Doorbell Camera System and equipment updates, especially of security software are regularly sought, applied and checked as properly functioning.				

**Annexe 2 Recorded Image Access Log**

CCTV Recorded Image Access Log					
Authorised Staff Name	Camera Number/Location	Date and Time of recording	Reason for Viewing (e.g. Vandalism, Behaviour incident)	Further Action Taken (e.g. any images/recordings saved or shared?)	Notes- e.g. Authorisation for sharing/retention period for retained images



## Annexe 3 Arlo video doorbell camera Operator Agreement

### ARLO VIDEO DOORBELL CAMERA OPERATOR AGREEMENT

People authorised to view the recordings are set out in the Arlo video doorbell camera Policy.

I confirm I have read and understood the Arlo Video Doorbell Camera System Policy and agree to adhere by the rules of the policy as an operator of this system.

In addition, I will update the Arlo Video Doorbell Camera System Recorded Image Access Log each time I access the system to review a recording. I will:

- record the reason for viewing any images
- detail any retained images, why these were retained and diarise to review saved images for deletion
- I will ensure any retained images are password protected.
- I understand images including retained images must not be shared with third parties, including staff who are not part of the senior leadership team.
- any shared images must have approval for sharing from the Headteacher.

Name of authorised operator:

Signature:

Date:

I confirm that \_\_\_\_\_ is an authorised operator of the Arlo Video Doorbell Camera System.

Headteacher:

Date:



**THESE PREMISES ARE  
PROTECTED BY 24 HOUR ARLO  
VIDEO DOORBELL CAMERA  
SYSTEM RECORDING**

**Images are being monitored for the purpose of public safety,  
crime prevention, detection and prosecution of offenders.**

**The scheme is controlled by:**

**CHARLESWORTH VC PRIMARY SCHOOL**

**For further information contact:**

**THE SCHOOL OFFICE TEL NO: 01457 853475**