



400 YEARS OF EXCELLENCE

Policy Governing Operation of CCTV

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Policy review date	July 2022
Policy Lead	Jane Beacom, Deputy Headteacher
Governor or SLT approval	Governor Approval
Governor committee responsible for policy	Finance

General Data Protection Regulations 2018

Rationale

Closed circuit television is installed and operated at Richard Hale School for security and health and safety purposes. Images from the installed cameras may be viewed and recorded.

Usually the CCTV equipment and the images recorded by it are controlled by the Headteacher and Deputy Headteacher who are responsible for how the system is used. Occasionally, the CCTV system may be shared with another organisation, such as a facilities management company, or an organisation that provides out of school hours activities. It may be the case that, in these scenarios, there are joint data controllers responsible for the CCTV system. Where this is the case, the joint data controller is listed below.

Aims

The purpose of this policy is to regulate the management, operation and use of the CCTV system at Richard Hale School and to ensure compliance with the current legislation.

Article 6 (1) (e) of the General Data Protection Regulation provides the school with a lawful basis for processing CCTV images where 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'.

Objectives of this CCTV Policy are:

- a) To increase personal safety of pupils, staff and visitors, and reduce the fear of crime
- b) To protect the school buildings and their assets
- c) To support the Police in a bid to deter and detect crime
- d) To assist in identifying, apprehending and potentially prosecuting offenders
- e) To protect members of the public and private property
- f) To assist in managing the school.

Procedures

Positioning of cameras

The system comprises a number of fixed cameras located within the school grounds.

- 3 cameras are located around corridors of the Main Building
- 3 cameras are located around corridors of the New Block building
- 2 cameras are located around corridors of the PE Department
- 1 camera is located in the corridor of the 6th Form block
- 1 camera is located in the corridor of the Science block
- 1 camera is located in the Main Hall
- 1 camera is located in the Reception area
- 3 cameras are located in the Dining Hall
- 8 cameras are located in student Private Study areas
- 2 cameras are located by the Maths block
- 8 additional cameras are located around the perimeter of the buildings.

Type of imagery

Our cameras record digital moving images and have ANPR (Automatic Number Plate Recognition) capability to further safeguard our staff, students and visitors.

Signage

Signs are positioned at the entrance to the School as required by the Code of Practice. These signs will indicate that CCTV monitoring and recording are in use on the premises.

Recording of CCTV images

Recordings may be made from any of the CCTV cameras. These recordings include a date, time and system information overlay. Recording equipment and media will be housed in a place to which only administration and security staff have access. Recordings will be kept for 30 days, unless required as part of an ongoing investigation (or because the recording has been made over a holiday period), in which case recordings will be retained for as long as required for that investigation. At the end of 30 days the media will be recycled and the recordings will be erased by overwriting them with new recordings.

The CCTV system will operate 24 hours each day, every day of the year, recording all activity in the areas covered. Cameras will be used to monitor activities within the school to identify adverse activity actually occurring, anticipated or perceived, and for the purpose of securing the safety and wellbeing of the school's pupils and staff, together with its visitors. At no time will a camera be directed to follow or track an individual. Materials or knowledge secured as a result of CCTV use will not be used for any commercial or media purpose.

The management of the CCTV system will be overseen by the member of SLT with responsibility for the school premises. They are responsible for ensuring that the CCTV system is operated according to this policy and that regular audits are carried out to ensure that procedures are complied with. The day to day management and administration of the system is the responsibility of the Site Manager. The maintenance, security and support of the system is the responsibility of the Network Manager. The Network Manager is responsible for maintaining the recordings, ensuring their security and deleting them within the specified time period.

Viewing of CCTV images

Display equipment used to view the images from CCTV cameras will be located and positioned in such a way as only those responsible for security may ordinarily see the screen. Where display equipment is provided for controlled access security at a particular place such as a door entry point, display equipment will be located and positioned in such a way that only those likely to operate the system can view the image.

Recorded images may be viewed by members of the Senior Leadership Team or anybody delegated by them. With the exception of subject access requests under Data Protection Law (see below), only those who necessarily have to see the image for security and health and safety purposes may do so. Recorded images may be used to aid the identification of individuals for damage prevention or health and safety purposes.

Images can be viewed in the Site Manager's office and the Network Manager's office. Copies (electronic or paper) of images may be authorised by members of the Senior Leadership Team.

Authorised staff may only allow external persons or agencies to view CCTV images with the express permission of the Headteacher and by following the procedures below.

Requests by law enforcement agencies (most commonly the police) can be authorised by the school under the Data Protection Act 2018, Schedule 2, Part 1, Paragraph 2. A copy of images may be released to the agency on the understanding that the images remain the property of the school and the school may refuse permission for the agency to pass the images to any other person. Such requests should be made to the Headteacher.

Applications received from outside bodies (e.g. solicitors) to view or release footage will be referred to the Headteacher. In these circumstances, footage will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, or in response to a Court Order.

Requests may come from other external individuals and consideration would need to be given to how genuine or necessary the request is and whether there is any risk to the safety of others.

Subject Access Requests

The Data Protection Legislation allows individuals whose images have been recorded the right to view the images of themselves and to have a copy of the images. This is termed a Subject Access Request. Requests of this nature should be made to the Headteacher who will make arrangements for the images to be provided within one month of the request if possible. The person making the request must give sufficient information to enable the images to be found. The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

It is important that the school does not compromise anyone else's privacy, so you will only be able to view CCTV footage that does not contain images of third parties or images that would enable you to identify other people. Images of other subjects would need to be edited or blanked out to make sure no one else can be identified.

This process is costly, and one which the school has the right to refuse to undertake if the costs are disproportionate. Alternatively, the costs may be passed onto the person who has made the request.

The Information Commissioner has published a separate CCTV Code of Practice detailing how to operate a system in accordance with Data Protection Legislation. Where necessary, the Headteacher or their representative will refer to this Information Commissioners Code of Practice (sections 5.2.2 & 5.2.3) for further guidance on disclosing images to law enforcement agencies or to individuals.

In all such cases where requests are made the school will keep a detailed log (register) of the nature of the request and the details/images provided. The Headteacher, or a senior leader acting on their behalf, will initially investigate any breach of this Policy by school staff. Any serious breach of this Policy will be subject to the terms of disciplinary procedures already in place.

The Headteacher or their representative may carry out performance monitoring, including random operating checks.

System maintenance

Display equipment and recordings may be viewed by personnel authorised to undertake installation and maintenance of the CCTV systems. Such viewing will be restricted to that necessary for system work.

Police cooperation

The School wishes to maintain good working relations with the police and will cooperate whenever it can do so within the law.

CCTV – Privacy Notice

Closed circuit television is installed and operated at the School for security and health and safety purposes. Images from the installed cameras may be viewed and recorded. This privacy notice explains what personal information is collected, what it is used for and who it is provided to. The notice also describes why we require your data, and the legal basis on which we do this. This privacy notice relates to our CCTV System, including, but not limited to, where it has been installed on the outside of some of our buildings. It provides additional information that specifically relates to this particular service, and should be read together with our general privacy notice.

What personal information does this service use?

The CCTV system captures images of people and vehicles in and around where a camera is located. Where fixed CCTV cameras are operating, signs are clearly displayed.

Images captured by CCTV will not be kept for longer than 30 days, unless over a holiday period. However, on occasions there may be a need to keep images for longer, for example where an incident is being investigated.

What is your personal information used for?

We use your personal data for the following reasons:

- a) To increase personal safety of pupils, staff and visitors
- b) To protect the school buildings and their assets
- c) To assist the Police in identifying potential offenders
- d) To assist in managing the school

What is the lawful basis we are relying on?

We collect and use this information to ensure the school can undertake its remit to educate children ensuring personal safety of pupils, staff and visitors, protecting school buildings and

its assets and to assist in managing the school (Article 6(1)(e) of the General Data Protection Regulation).