



400 YEARS OF EXCELLENCE

Policy Governing Operation of CCTV

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| 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.

- A1. Science playground
- A2. Art block grass verge / Main vehicle exit
- A3.
- A4. Steps to field / garage / Science emergency stairs
- A5. DT exit
- A6. Hall entrance / bicycle rack
- A7. Drama entrance / car park
- A8. Car park and bin store near drama
- A9. New block corridor – English office to main entrance
- A10. Back of drama down to Hale rd pedestrian gate
- A11. Back of New block
- A12. Science playground and mini buses
- A13. SSC entrance and car park
- A14. Caretaker office and main steps

A15. Boiler house entrance

A16. Oak tree green

B1. Back of Hall

B2. Path between Porta cabins and back corridor classrooms

B3 Front of Porta cabins

B4. Path between porta cabins and gym

B5. Back of the gym

B6. Side of music

B7. Back of music / steps to 3G

B8. 6th Form Block / side of music

B9. Entrance to music / side entrance to 6th form block

B10. Entrances to gym, art and main building (side)

B11. New block main entrance (internal)

B12. Drama main entrance (internal)

B13. Hall entrance steps / New block entrance / Benches

B14. Hall entrance steps / Caged area entrance

B15. Hall entrance

B16. Hall (Internal)

C1. Dining hall

C2. Dining hall

C3. 6th form balcony

C4. Entrance to gym and changing room doors

C5. 6th form study lower level

C6. 6th form study lower level

C7. 6th form study lower level

C8. 6th form study lower level

C9. 6th form study upper level

C10. 6th form study upper level

C11. Gym entrance and roller shutter

C12. 6th form exit to music

C13. Back corridor by the exit to food tech

C14.

C15. Y13 Study left

C16. Y13 Study right

D1. Site team office and corridor

D2. Dining hall entrance

D3. Science block ground floor stairs

D4. Back of hall / bridge from science to tech

D6. Reception and main entrance (Internal)

E2. Top car park

E3. Top car park

E4. Pavilion entrance / 3G pitch

E5. Pavilion entrance / 3G pitch

- E9. Top car park exit / bund
- E11. 3G pitch / top field
- E12. 3G pitch / top field
- E13. 3G pitch spectator's area
- E14. 3G pitch entrance

- F1. Main vehicle entrance
- F2. Main vehicle exit
- F3. Hale road vehicle entrance gate
- F4. Hall stairs / exit to tech
- F5. Y9 toilet entrance and corridor

- G1. Hale road pedestrian access gate
- G2. Path to Hale road pedestrian access
- G3. Subway
- G4. Main exit
- G5. 3G Pedestrian access
- G6. Hall to room K corridor
- G7. Sports hall store
- G8. Sports hall
- G9. Sports hall changing room entrance
- G10. Sports hall toilet entrance
- G11. Sports hall
- G12. Sports hall / back / external
- G13. Sports hall plant room entrance
- G14. Sports hall / side / external
- G15. Sports hall entrance
- G16. Sports hall emergency exit / external

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 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.

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).