

Upper Shirley High School

Closed Circuit Television (CCTV) Policy

Introduction

The purpose of this policy is to regulate the review, management, operation, and use, of closed circuit television (CCTV) at Upper Shirley High School.

Objectives of the CCTV Scheme

- To increase personal safety of students, staff and visitors, and reduce the fear of crime
- To monitor and minimise unauthorised and inappropriate vehicle access
- To assist in managing the school and to protect the school buildings and their assets
- To support the Police in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property

Statement of Intent

- The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly.
- The school will treat as data all CCTV recordings and relevant information.
- Cameras will be used to monitor activities within the school and grounds in line with the objectives of the scheme.
- Static cameras are set so they do not focus on private homes, gardens and other areas of private property.
- Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained in writing for directed surveillance to take place.
- Materials or knowledge secured as a result of CCTV will not be released to the media, or used for any commercial purpose, or for the purpose of entertainment. Recordings will only be released under written authority from the Police, or in respect of a subject access request.
- The planning and design has endeavoured to ensure that the scheme will give maximum effectiveness and efficiency. It is not possible, however, to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.
- Warning signs have been placed at all access routes to areas covered by the school's CCTV and are prominently placed in external places close to school entrances.

System in place

This comprises of the following:

- 31 x external analogue cameras
- 4 x 360° outdoor cameras
- 17 x outdoor dome cameras
- 45 x indoor dome cameras

System specification

- It does not have sound recording enabled
- It is operated and owned by the school
- Deployment is determined by the Headteacher

Operation of the system

- The Headteacher is responsible for the operation of the CCTV system and for ensuring compliance with this policy.
- Breaches of the policy by staff monitoring the system may constitute a disciplinary matter under the relevant conditions of employment.
- Any concerns in respect of the system's use or regarding compliance with this policy should be addressed to the Headteacher.
- The system will be administered by the Site and ITS Manager along with relevant site staff; working in accordance with the principles and objectives expressed in this policy.
- The CCTV system will be in operation 24 hours each day, for every day of the year.
- The ITS Manager will check on a weekly basis that the system is operating effectively and in particular that the equipment is properly recording and that cameras are functional.
- The system will be regularly serviced and maintained.

Control and access to the CCTV system

- The Headteacher has overall responsibility for the control of images and deciding how the CCTV system is used.
- The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 1998. This policy outlines the school's use of CCTV and how it complies with the Act.
- Access to the CCTV system will be strictly limited to authorised operators with a password. It is accessible only by designated staff with responsibility for security, behaviour or attendance.
- Unless in an immediate response to events, staff using the CCTV software must not direct cameras at an individual or a specific group.
- Operators must satisfy themselves that all persons viewing CCTV material has the right to do so.
- The system may generate a certain amount of interest, it is vital that operations are managed with the minimum of disruption.
- The main control facility must be kept secure.
- Other administrative functions will include controlling and maintaining downloaded digital materials, and maintenance and system access logs.
- Any changes to CCTV monitoring will be subject to consultation with staff and the school community.
- All operators and employees with access to images are aware of the procedures that need to be followed when accessing recorded images and sound.
- All operators will receive training in respect of their responsibilities under the CCTV Code of Practice (<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>)
- All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.
- The following people have access to the cameras:

Administrator rights – Full access to system and configuration.	Operator – Access to live and recorded video. No access to configuration. Can be limited to select cameras.	Viewer – Can only view selected live cameras. No access to recorded video or configuration.
IT Services Manager	Site Team	Site Team iPad
Site Manager	Business Manager	
IT Services Technician	Attendance Officer	
	Guidance and Achievement Coordinator	

Siting the Cameras

- Cameras are sited so they only capture images relevant to the purposes for which they are installed and care is taken to ensure that reasonable privacy expectations are not violated. The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

- The school makes every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.
- CCTV is not used in standard classrooms. Cameras are positioned however, in the recording studio, ICT rooms and in the school technology workshops, as these are high value locations and likely to be the focus of out of hours crime.
- Members of staff have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

CCTV Signage

- It is a requirement of the Data Protection Act 1998 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.
- The CCTV sign should include the following:
 - That the area is covered by CCTV surveillance and pictures are recorded
 - The purpose of using CCTV
 - The name of the school
 - The contact telephone number or address for enquiries

Covert Monitoring

The school may in exceptional circumstances set up covert monitoring. For example

- where there is good cause to suspect that illegal or unauthorised action(s) are taking place, or where there are grounds to suspect serious misconduct.
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from the Headteacher. Covert monitoring must cease following completion of an investigation. Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example, toilets.

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.

Access to CCTV images

Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

Subject Access Requests (SAR)

- Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- All requests should be made in writing to the Headteacher.
- Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
- The school will respond to requests within 40 calendar days of receiving the written request and fee. A fee of £10 will be charged per request.
- As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and the images pixelated so that only the person requesting access can be identified. The school has software that enables images to be pixelated, but if it is not possible to conceal the identity of others, disclosure is unlikely. Refusal to disclose images, even if pixelated, may be appropriate where its release is:
 - Likely to cause substantial and unwarranted damage to an individual.
 - To prevent automated decisions from being taken in relation to an individual.

- Likely to prejudice the legal rights of individuals or jeopardise an ongoing investigation.

Access to and Disclosure of Images to Third Parties

- There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).
- Requests for access should be made in writing to the Headteacher.
- The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

Complaints

- Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher at the school.
- If the issue remains unresolved, complainants should follow the school Complaints policy.
- If the issue remains unresolved, and the complainant considers that the school is not operating within the Code of Practice as issued by the Information Commissioners Office, they are advised to contact the Information Commissioners Office via www.ico.org.uk.