

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 seeks to comply with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.
- 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 as to 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

Change this entire section from the specifics of our cameras to something like: "The system comprises of both fixed and dome cameras located around the school site".

This currently comprises the following:

- 31 x external analogue cameras
- 4 x 360° outdoor cameras
- 17 x outdoor dome cameras
- 49 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 using and monitoring the system for non-work related matters i.e. for their own recreation or interest may constitute matters of discipline under the relevant conditions of employment. Use of the system must be in direct relation to a member of staff's job role and job description.
- For new users, there needs to be a clear written communication from a member of SLT granting access to the system stating the reason for access and under what circumstances the member of staff is authorised to use the system. (This is to be shared with the IT Manager)
- New users will receive the following information:
 - Staff will be advised that recreational use of the system is forbidden and may become a disciplinary matter – explained by the member of SLT granting access and reiterated by the IT Manager
 - All staff are to be signposted to the location of this CCTV policy
 - Any new users will sign a read receipt slip for CCTV Policy – to be retained by the IT Manager
 - The IT Manager will explain how to use the system
- 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 IT Managers 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, every day of the year.
- The IT Manager will check on a weekly basis that the system is operating effectively and in particular that the equipment is recording properly 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.
- Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available without written consent from a member of SLT. If there is a need to investigate a specific behavioural incident, permission to see an image can be granted by a Head of Year.
- 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 have 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, 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 members of staff 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	Receptionist
IT Services Technician	Attendance Officer	Finance Team
	Guidance Lead (KWR)	HR Officer
	Guidance Assistant (KCR)	
	Heads of Year	

All staff with access to the system must read this policy and sign to acknowledge they understand its content.

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 may however be positioned in areas of high value such as ICT suites and school technology workshops, as well as in areas of higher risk for staff and student projection.
- Members of staff are made aware of CCTV cameras in operation within their working areas and 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 and/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.

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 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 the 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 Commissioner's Office, they are advised to contact the Information Commissioner's Office via www.ico.org.uk.

Policy Receipt Acknowledgement

I have read and been informed about the content, requirements and expectations of this policy. I have received a copy of the policy and agree to abide by the policy guidelines.

I understand that if I have questions, at any time, regarding the policy, I should direct them to the School Business Manager,

Employee Signature: _____

Employee Printed Name: _____

Date: _____