



# CCTV policy

Date approved: July 2022

Date for review: July 2023

Signature:..... (Chair of Governors)

Print name:.....Date: .....

## **1. Introduction**

1.1 The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Rigby Hall school, hereafter referred to as 'the school'.

1.2 The CCTV system is owned by the school.

1.3 The system comprises of various fixed position dome and bullet style cameras located in and around the school site.

1.4 On a day to day basis, cameras are monitored by nominated Senior and support staff, along with those individuals directly involved with the security of the school site. Recorded images from any camera can only be accessed with express permission from either the Headteacher or other nominated individuals.

1.5 The systems will not be used for any other purpose than those set out in this document without prior consultation with the Headteacher, and where appropriate, notification to staff.

1.6 This Policy has been drafted in compliance with the requirements of the General Data Protection Regulation.

1.7 The ongoing suitability of the School CCTV Policy will be reviewed regularly by the Governing Body.

## **2. Objectives of the CCTV Policy**

This Policy covers the use of CCTV systems, which capture moving and still images of people who could be identified, for the following purposes;

- to protect School buildings, and their assets within;
- to increase personal safety of those within, and visiting the school;
- to act as a deterrent for poor behaviour and damage to the school;
- to support the Police in a bid to deter and detect crime;
- to assist in identifying, apprehending and disciplining offenders.

## **3. Statement of Intent**

3.1 The School will treat the system and all information, documents and recordings obtained and used as data which are protected by the General Data Protection Regulation and will be processed in accordance with the requirements of the regulation.

3.2 Cameras will be used to monitor activities within the school and its grounds to identify criminal activity occurring, anticipated or perceived, and in order to ensure the safety and wellbeing of the School community.

3.3 The school will only operate overt surveillance and will display signs in the areas of the school where this is in operation. Covert surveillance (i.e. which is intentionally not shared with the individuals being recorded) is not condoned by the school.

3.4 Warning signs, as required by the Code of Practice of the Information Commissioner, have been placed at all access routes to areas covered by the school CCTV.

3.5 The CCTV system will not be trained on individuals unless an immediate response to an incident is required.

3.6 The CCTV system will not be trained on private vehicles or property outside the perimeter of the school.

#### **4. The Data Protection Principles**

4.1 Data collected from CCTV will be processed in accordance with the principles of the General Data Protection Regulation. As such, all data will be:

- (a) Processed lawfully, fairly and in a transparent manner in relation to individuals
- (b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- (c) Adequate, relevant and limited to what is necessary in relation to the purpose(s) for which they are processed
- (d) Accurate and where necessary, kept up to date
- (e) Kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data are processed
- (f) Processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing, and against accidental loss, destruction or damage, using appropriate technical and organisational measures.

#### **5. Operational Control & Protocols**

5.1 Access to the CCTV system, software and data, will be strictly limited to authorised operators and will be password protected.

5.2 The system will be managed by the Headteacher/Business Manager in accordance with the principles and objectives expressed in this Policy.

5.3 The day-to-day administration of the system will be the responsibility of the Business Manager.

5.4 The CCTV system will be operated 24 hours a day every day of the year.

5.5 The Business Manager will check and confirm the efficiency of the system once per month and, to confirm that the equipment is properly recording and that cameras are functional.

5.6 The Business Manager will ensure that all staff involved with the operation of the CCTV system are properly trained and fully understand their roles and responsibilities in respect of data protection issues.

5.7 Members of the school Site Team involved in the security of the school have access to live view access to selected cameras that involve site security.

5.8 Staff, visitors and others entering areas with CCTV viewing monitors will not be granted viewing access.

5.9 The system may generate a certain amount of interest. It is vital that operations are managed with the minimum of disruption. Casual observations will not be permitted.

5.10 If an emergency arises out of hours, permission must be obtained from the Headteacher to view or process recorded material.

5.11 Other operational functions will include maintaining recorded materials and hard disc space, filing and maintaining occurrence and system maintenance logs.

## **6. Monitoring Procedures**

6.1 Camera surveillance may be maintained at all times.

6.2 Pictures will be recorded when activated by movement.

6.3 No covert monitoring will be undertaken until the circumstances have been considered by, and authorisation obtained from the Headteacher.

## **7. Recorded Material Procedures**

7.1 In order to maintain and preserve the integrity of the recorded material used to record events from the CCTV system, and the facility to use them in any future proceedings, the following procedures for their use and retention **must** be strictly adhered to:

- (i) Each item of recorded material must be identified uniquely;
- (ii) The system will register the date and time of recorded material, including recorded material reference.
- (iii) Any recorded material required for evidential purposes must be sealed, witnessed, signed by the Headteacher, dated and stored in a separate, secure recorded material store. If recorded material is not copied for the Police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed, signed by the Headteacher, dated and returned to the evidence material store.
- (iv) If the recorded material is archived the reference must be noted.

7.2 Recorded materials may be viewed by / released to third parties, only in the following prescribed circumstances, and then only to the extent required by law:

- (i) The police, where any images recorded would assist in a specific criminal inquiry.
- (ii) Prosecution agencies, such as the Crown Prosecution Service (CPS);
- (iii) Relevant legal representatives such as lawyers and barristers.
- (iv) Persons whose images have been recorded and retained, and where disclosure is required by virtue of data protection legislation, or the Freedom of Information Act.

7.3 A record will be maintained of the release of recorded materials to the Police or other authorised applicants. A register maintained by the Headteacher will be made available for this purpose.

7.4 Viewing of recorded materials by the Police must be recorded in writing.

7.5 Should recorded material be required as evidence, a copy may be released to the Police. Recorded materials will only be released to the Police on the clear understanding that the recorded material remains the property of the School, and both the recorded material and information contained on it are to be treated in accordance with this document.

7.6 The school retains the right to refuse permission for the Police to pass to any other person the recorded material or any part of the information contained thereon. On occasions when a Court requires the release of an original recorded material this will be produced from the secure recorded material store, complete in its sealed bag.

7.7 If the Police require the school to retain the stored recorded materials for use as evidence in the future, such recorded materials will be properly indexed and properly and securely stored until they are needed by the Police.

7.8 Requests for access or disclosure will be recorded and the Headteacher will make the final decision as to whether the recorded images may be released to persons other than the police.

## **8. Record Keeping / Incident Logs**

8.1 The School will maintain adequate and comprehensive records relating to the Management of the system and incidents. Model documents from the installers/providers of CCTV system may be utilised for this purpose.

## **9. Retention of Data**

9.1 The system keeps images on a rolling 30-day period.

9.2 Where CCTV data is required to assist in the prosecution of a criminal offence, data will however need to be retained until collected by the Police.

9.3 Measures to permanently delete data should be clearly understood by persons that operate the system.

9.4 Systematic checks should be carried out to ensure the deletion regime is strictly followed.

## **10. Breaches of the Policy (including breaches of security)**

Any breach of the Policy by School staff will be initially investigated by the Headteacher to determine disciplinary action, if necessary, and to make recommendations on how to remedy the breach.

## **11. Assessment of the CCTV System**

Regular assessment will be undertaken by the Headteacher/Business Manager to evaluate the effectiveness of the CCTV system.

The outcome of the assessment will be reported to a meeting of the School Governors who will determine if the system is achieving the objectives of the scheme, or if the system requires modification.

## **12. Complaints**

Any complaints about the school CCTV system should firstly be made, in writing, to the Headteacher. Complaints will be investigated in accordance with section 11 of this document.

### **13. Access by the Data Subject**

13.1 The General Data Protection Regulation provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.

13.2 Individuals have the right to submit a subject access request in order to gain access to their personal data.

13.3 If the individual is not the focus of the footage i.e. they have not been singled out or had their movements tracked then the images are not classed as 'personal data' and the individual is not entitled to the image under the provisions of Subject Access Requests.

13.4 In such instances, the school will verify the identity of the individual making the request before any information is supplied.

13.5 All requests will be responded to without delay, and at the most within one month.

13.6 Requests for access or disclosure will be recorded and the Headteacher will make a final decision as to whether recorded images may be released to persons other than the police.

13.7 Further guidance can be found in the school's procedure for responding to Subject Access Requests.