

CCTV Policy

Document 9

T.E.A.M Education Trust



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List of Associated Policies:	<ul style="list-style-type: none">• Document 1: Data Protection Policy & Appendices• Document 2: Pupil & Parent/Carer Privacy Notice• Document 3: Workforce Privacy Notice• Document 4: Record Retention & Deletion Policy• Document 5: Social Media Policy• Document 6: Bring your own device Procedure (BYOD)• Document 7: IT Security & Acceptable Use Policy• Document 8: Off Site Working Policy• Document 9: CCTV Policy• Document 10: Governors Privacy Notice• Document 11: Special Category Data Policy• Document 12: Protection of Biometric Information Policy	

Version History

Version	Date	Detail	Author
1	7.5.20	Original document adapted from DCC template	(GDPR PIS Service) GDPR for Schools
2	11.5.21	Clause 1.4, The CCTV system is owned by the school following installation (June 2021). Clause 4: new clause: Operation of, and access to, the system.	P Livingstone, IT Manager
3	14.5.21	GDPR PIS Service to GDPR for Schools (DPO)	J S Gibson, Data Protection Lead
4	10.5.22	GDPR for Schools (DPO) template used to compare with last revision. No major changes.	P Livingstone, IT Manager
5	03.05.23	Minor wording amendments as suggested by DPO	Education Data Hub, NBO

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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 TEAM Education Trust Schools that have CCTV Installations.
- 1.2 The system details are contained within an Appendix document.
- 1.3 This Policy follows Data Protection guidelines, including guidance from the Information Commissioner's Office and the Surveillance Camera Commissioner.
- 1.4 The CCTV system is owned by the school.
- 1.5 Authorised Staff
 - CEO
 - Trust Executives
 - Trust Estates & Facilities Manager
 - Senior Leadership Team Members
 - School Business Officer
 - Site Manager

2. Purposes of the CCTV scheme

- 2.1
 - (a) To protect the school buildings and their assets
 - (b) To increase personal safety and reduce the fear of crime
 - (c) To support the Police in a bid to deter and detect crime
 - (d) To assist in identifying, apprehending, and prosecuting offender
 - (e) To assist with the safeguarding and supervision of pupils

The school has identified the following legal bases for processing CCTV footage which will include personal data; UK GDPR Article 6(1)e (public task) and Article 9(2)(g) (substantial public interest) and Data Protection Act 2018 Schedule 1, paragraph 10 (preventing or detecting unlawful acts) and paragraph 36 processing criminal category data for purposes of substantial public interest.

3. Statement of intent

- 3.1 The School will seek to comply with the requirements both of the Data Protection Act ("the Act"), the Information Commissioner's Guidance on Video Surveillance and the Surveillance Camera Commissioner's Code of Practice.
- 3.2 The School will treat the system and all information, documents and recordings obtained and used as personal data which are protected by the Act.
- 3.3 Cameras will be used to monitor activities within the school to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of members of the school community **and** members of the public.
- 3.4 Materials or knowledge obtained as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Recordings will never be released to the media for purposes of entertainment.

- 3.5 The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.
- 3.6 Cameras will not record any private premises.
- 3.7 Signs that inform people of the existence of CCTV, as required by the Code of Practice of the Information Commissioner have been placed at access routes to areas covered by the school CCTV.
- 3.8 A log will be kept of Authorised Staff access to Recorded Images (template below)

4. Operation of, and Access to the system

- 4.1 The Scheme is administered and managed by The Principal, in accordance with the principles and objectives expressed in this policy.
- 4.2 Images can be accessed. Please refer to Appendix Doc for this information
- 4.3 No live feeds will be presented within offices at our schools. Live feeds are available to authorised staff for the management of the school, security of the site and safety of staff and pupils, and viewable from the Digital Video Recorder and monitor used by the CCTV solution only (no remote viewing permitted).
- 4.4 The CCTV system will be operated 24 hours each day, every day of the year.
- 4.5 CCTV recordings will be available for 1 month (with the exception of the Swan system at WTPS which is available for 7 days) unless copied to removable media (CDs, DVDs or Tapes etc). After this time any recordings will be automatically overwritten. Where CCTV is copied to be retained for longer periods this will be documented and justified in the Access Log. In this case, the footage will be held in accordance with the School Retention Schedule.

5. Printed and Recording Media Procedures

- 5.1 In the event of an incident requiring footage from the system to be retrieved and stored the following procedure should be followed:-
 - The details of the incident should be passed to the Principal, who will authorise the use of the system by an authorised CCTV operator.
 - The relevant footage will be identified.
 - An entry shall be made on the Recorded Image Viewing Log.
 - If the footage is required for investigation, then the User will produce a copy. The Date and Time of the recorded extract will be registered and stored in a secure place.
 - The footage may only be viewed by Authorised Staff.
 - A record of all viewings shall be made, which if required as evidence, may be released to the Police.
 - Applications received from outside bodies or Subject Access Requests to view or release records will be notified to the Principal.

6. Assessment of the System

- 6.1 One of the Authorised CCTV Operators will check and confirm the screen and cameras are working weekly.
- 6.2 Regular reviews of the system's operation will take place and any necessary changes in procedure and camera sighting/position will be implemented.
- 6.3 The Principal and DPO will carry out an annual review of the use of CCTV, using the Annual Review Checklist below.
- 6.4 The school will carry out a Data Protection Impact Assessment where necessary to review the use of CCTV where there is any significant change to the use of the system or the purpose for which is it used.
- 6.4 If out of hours emergency maintenance arises, the Premises Manager must be satisfied of the identity and purpose of contractors before allowing entry.

7. Breaches of the policy (including breaches of security)

- 7.1 Any breach of this Policy by school staff will be initially investigated by the Principal, in order for him/her to take the appropriate disciplinary action.
- 7.2 Any serious breach of this Policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

8. Complaints

- 8.1 Any complaints about the school's CCTV system should be addressed to the Principal.
- 8.2 Complaints will be investigated in accordance with the school's complaint Policy.

9. Access by the Data Subject

- 9.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to access copies of data held about themselves, including those obtained by CCTV.
- 9.2 Requests for Data Subject Access should be made in accordance with the Subject Access Request Procedure.

Appendix Document

SCHOOL: Stubbin Wood

The Schools system comprises a number of fixed *cameras* [*describe any others here e.g remote direction controlled or dome cameras or attach a list of cameras and location*] located around the school site.

All CCTV recorders are password protected and monitoring is only available to authorised staff.

Camera Locations:

1. Turning circle
2. Corridor outside nurse's office
3. Staff room exterior
4. Blue gazebo in secondary yard
5. Roundabout & wooden gazebo in secondary yard
6. Sensory garden
7. Reception Foyer
8. Community entrance corridor
9. Pool changing room corridor
10. Primary corridor
11. Primary dining 1
12. Primary dining 2
13. KS3 corridor
14. KS4 corridor
15. KS5 corridor
16. Entrance lobby
17. External dome camera - Primary yard & fire exit
18. The Den intervention space
19. KS2 outdoor yard
20. Sensory garden entrance
21. Main hall
22. KS1 yard & field
23. Primary yard & MUGA
24. Primary & secondary yards

Images are on a screen located in the secure locked server room, which has limited user access. The monitor is switched off as another default measure.

School: Whaley Thorns

The Schools system comprises a number of fixed *cameras* located around the school site.

This school has two CCTV systems, the new system is accessible on a screen within a locked cabinet and is password protected. The old system is also password protected and is not accessed via the application. CCTV monitoring is only available to authorised staff.

1. Main entrance gate
2. Entrance boundary gate
3. Entrance path
4. Old entrance & car park
5. Car park
6. Outside hall fire exit
7. Outside kitchen entrance
8. Cleaning store area
9. Play equipment

10. Playground 1
11. Warrener outdoor yard 1
12. Playground 2
13. Warrener outdoor yard 2

Whaley Thorns Old CCTV system

1. Second corridor
2. Reading Shed & Football field
3. Nursery exit & Warrener entrance
4. Far path around Warrener
5. Secondary (old) entrance
6. Playground
7. Entrance corridor
8. Courtyard

Annexe 1 CCTV System Annual Review Form

CCTV SYSTEM ANNUAL REVIEW					
School:				Date:	
Reviewed by:				Signed:	
Review Statement	Satisfactory		Problems Identified?	Corrective Action Required (if relevant)	
	Yes	No			
The School is registered with the Information Commissioner's Office and the next renewal date recorded.					
There is a named individual who is responsible for operation of the system.					
The problem we are trying to address has been clearly defined and installing cameras is the best solution.					
The CCTV system is addressing the needs and delivering the benefits that justified its use.					
The system equipment produces clear images which the police can use to investigate crime and these can easily be taken from the system when required.					
Cameras have been sited so that they provide clear images.					
Cameras have been positioned to avoid capturing images of people who are not visiting the premises.					
There is sufficient suitable signage notifying people that CCTV monitoring is in operation, including our contact details where it might not be obvious that the system is managed by this school.					
Information is available to help deal with queries about operation of the system and how individuals can make access requests.					
Sufficient safeguards are in place to protect wireless transmission systems from interception.					
There are sufficient controls and safeguards in place if the system is connected to, or made available across, a computer, e.g. an intranet.					

Review Statement	Satisfactory		Problems Identified?	Corrective Action Required <i>(if relevant)</i>
	Yes	No		
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.				
Recorded data will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.				
The process for deleting data is effective and being adhered to.				
Except under the direction of an appropriate public authority (usually police), images will not be provided to third parties, unless the Principal has approved the disclosure of the data under the advice of the DPO.				
When information is disclosed, it is transmitted as securely as possible e.g. viewed on school premises, hand delivered/collected in person on a device, a fully tracked postal service etc.				
Staff are trained in security procedures and there are sanctions in place for any misuse of surveillance system information.				
Regular checks are carried out to ensure that the system is working properly and produces high quality and useful data.				
There is a system in place to ensure that any manufacturer recommended CCTV system and equipment updates, especially of security software are regularly sought, applied and checked as properly functioning.				

Annexe 2 EXAMPLE CCTV Recorded Image Access Log

CCTV Recorded Image Access Log					
Authorised Staff Name	Camera Number/Location	Date and Time of recording	Reason for Viewing (e.g. Vandalism, Behaviour incident)	Further Action Taken (e.g. any images/recordings saved or shared?)	Notes- e.g. Authorisation for sharing/retention period for retained images



CCTV OPERATOR AGREEMENT

People authorised to view the recordings are set out in the CCTV Policy.

I confirm I have read and understood the CCTV policy and agree to adhere by the rules of the policy as an operator of this system.

In addition, I will update the CCTV Recorded Image Access Log each time I access the system to review a recording. I will:

- record the reason for viewing any images
- detail any retained images, why these were retained and diarise to review saved images for deletion
- I will ensure any retained images are password protected.
- I understand images including retained images must not be shared with third parties, including staff who are not part of the senior leadership team.
- any shared images must have approval for sharing from [the Principal].

Name of authorised operator:

Signature:

Date:

I confirm that _____ is an authorised operator of the CCTV system.

[Principal:

Date:



**THESE PREMISES ARE
PROTECTED BY 24 HOUR CCTV
RECORDING**

**Images are being monitored for the purpose of public safety,
crime prevention, detection and prosecution of offenders.**

The scheme is controlled by:

[SCHOOL NAME HERE]

For further information contact:

THE SCHOOL OFFICE TEL NO: [TEL NO HERE]