

Claycots School Partnership

CCTV Policy

Owner:	David Powell
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INTRODUCTION

A Closed Circuit Television System (CCTV) is installed at both sites of Claycots School (Britwell and Town Hall)

At the Town Hall Campus there are a number of cameras that are under the control of Slough Borough Council and are not the property or under the control of Claycots School. Claycots School CCTV policy does not apply to the use of these cameras and are used in accordance with Slough Borough Council's CCTV policies and practices. For further information please see the Slough Borough Council website.

Any new CCTV systems will be introduced in consultation with key staff and the Board of Governors. Where systems are already in operation, their operation will be reviewed regularly by key staff.

1. PURPOSE OF POLICY

The purpose of this policy is to regulate the use of Closed Circuit Television and its associated technology in the monitoring of both the internal and external environs of the premises under the remit of Claycots School.

CCTV systems are installed (both internally and externally) in premises for the purpose of enhancing security and protection of investments made in the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external environs of the premises during both the daylight and night hours each day. CCTV surveillance at the school is intended for the purposes of:

- protecting the school buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, pupils and visitors;
- preventing bullying;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the Police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and
- ensuring that the school rules are respected so that the school can be properly managed.

2. SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. Where classes and activities are carried out in rented premises, Claycots School will ensure that CCTV systems, where installed, are operated only in a way that is compatible with the provisions of this policy.

3. GENERAL PRINCIPLES

Claycots School as the operating body has a statutory responsibility for the protection of its property and equipment as well providing a sense of security to its employees, pupils and invitees to its premises.

Claycots School also owes a duty of care under the provisions of Safety, Health and Welfare at Work Act 2005 and associated legislation and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life of the school community by integrating the best practices governing the public and private surveillance of its premises.

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.

Any requests from the Police for CCTV recordings/images will be logged appropriately, and any necessary legal advice will be sought if any such request is made. (See "Access" below). If a law enforcement authority, such as the Police, is seeking a recording for a specific investigation, they may require a warrant. Any such request made by the Police should be requested in writing and the school reserves the right to seek legal advice.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including provisions set down in equality and other educational and related legislation. This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

Video monitoring of public areas for the purposes laid out in this policy within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school. All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by Claycots School. Recognisable images captured by CCTV system are classed as Personal Data. They are therefore subject to the provisions of the Data Protection Act.

4. JUSTIFICATION FOR USE OF CCTV

The Data Protection Act requires that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that Claycots School needs to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV to monitor for the purposes laid out in this policy has been deemed to be justified by the school. The system is intended to capture images of intruders, fly tippers or of individuals damaging property, removing goods without authorisation and for the purposes of Safeguarding our staff, pupils and visitors.

Should CCTV be installed internally, for example in a corridor, hall, cloakroom, stairwell, doorways and main entrances/exits/handwashing facilities in the toilets, the Headteacher will demonstrate that there is a proven risk to security and/or health & safety and that the installation of CCTV is proportionate in addressing such issues that have arisen prior to the installation of the system.

5. LOCATION OF CAMERAS

The location of cameras is a key consideration. Claycots School has endeavoured to select locations for the installation of CCTV cameras which are least intrusive, to protect the privacy of individuals whilst ensuring the security and condition of the building and its' facilities. Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

CCTV Video Monitoring and Recording of Public Areas at Claycots School may include the following:

- **Protection of school buildings and property:** The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, waste disposal area, receiving areas for goods/services
- **Monitoring of Access Control Systems:** Monitor and record restricted access areas at entrances to buildings, car park and other areas
- **Verification of Security Alarms:** Intrusion alarms, exit door controls, external alarms
- **Video Patrol of Public Areas:** Parking areas, Main entrance/exit gates, Traffic Control
- **Criminal Investigations (carried out by Thames Valley Police):** Robbery, burglary and theft surveillance
- **Safeguarding:** To ensure the safety and welfare of Claycots School staff, pupils and visitors.

6. COVERT SURVEILLANCE

Claycots School will not engage in covert surveillance.

Where the Police requests to carry out covert surveillance on school premises, such covert surveillance may require the consent of a judge. Accordingly, any such request made by the Police will be requested in writing and the school will seek legal advice.

7. NOTIFICATION – SIGNAGE

The school will provide a copy of this CCTV Policy on request to staff, parents and visitors to the school. This policy describes the purpose and location of CCTV monitoring and a contact number for those wishing to discuss CCTV monitoring and guidelines for its use. Adequate signage will also be prominently displayed at the entrance to Claycots School property to indicate that CCTV is in operation. Signage shall include the name and contact details of the data controller.

Appropriate locations for signage could include:

- at entrances to premises i.e. external doors, school gates
- reception area
- waste disposal bin area

8. STORAGE & RETENTION

The Data Protection Act states that data "shall not be kept for longer than is necessary for the purposes for which it was obtained. A data controller needs to be able to justify this retention period".

Accordingly, the images captured by the CCTV system will be retained for a maximum of 60 days so as to cover a long period where the school may be unoccupied (for example the summer holidays), except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

CCTV equipment, images/recordings will be stored in a secure environment. Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the nominated key members of staff. In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above (such individuals may include the Police, the Deputy Headteacher, other members of staff, representatives of the Department of Education, representatives of the HSE and/or the parent of a recorded pupil).

9. ACCESS

The recorded footage and the monitoring equipment will be securely stored in a restricted area.

The hardware that contains the CCTV recordings will be stored on school owned equipment which is in a locked or secured area. Physical access to the equipment is limited to key personnel. Any other person who requires access to this location will be in agreement with the IT and Data Manager and supervised at all times to ensure that tampering does not take place.

Access to the stored images will be restricted to authorised personnel only: Headteacher, Business Manager, IT and Data Manager, Site and Compliance Manager, IT Technicians and Site Assistants. The images will be secured on the computer network by means of username and password for each user. These usernames and passwords are subject to standard Claycots School ICT policies and procedures ie. must not be used by anyone other than the user they are intended for.

In relevant circumstances CCTV **footage** may be accessed. These circumstances may include:

- To ascertain if any actions have taken place that contravene Claycots School's policies, procedures or the law.
- By the Police where Claycots School are required by law to make a report regarding the commission of a suspected crime; or
- Following a request by Thames Valley Police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on Claycots School property, or
- Any statutory body charged with child safeguarding; or
- To assist the Headteacher (or delegated member of staff) in establishing facts in cases of unacceptable pupil behaviour; or
- To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to Claycots School, or
- To individuals (or their legal representatives) subject to a court order.
- To the school's insurance company where the insurance company requires same, in order to pursue a claim for damage done to the insured property.

Requests by the Police: Information obtained through video monitoring will only be released when authorised by the Headteacher, Business Manager or IT and Data Manager. If the Police request CCTV images for a specific investigation, the Police may require a warrant and accordingly any such request made by the Police should be made in writing and the school should immediately seek legal advice.

Access requests: On written request, any person whose image has been recorded has a right to be given a copy of the information recorded which relates to them, provided always that such an image/recording exists i.e. has not been deleted and provided also that an exemption/prohibition does not apply to the release. Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that any other person is not identified or identifiable. This

may not be possible where the captured images contain a high number of other individuals and thus the school refuses the right to release these images where redaction may not be possible. To exercise their right of access, a data subject must make an application in writing to the school.

A person should provide all the necessary information to assist Claycots School in locating the CCTV recorded data, such as the date, time and location of the recording. If the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data and may not be handed over by the school.

In giving a person a copy of their data, the school may provide a still/series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

10. RESPONSIBILITIES

The IT and Data Manager will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Claycots School
- Maintain a record of the release of any material recorded or stored in the system
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place
- Report to the Health & Safety Officer (the Site & Compliance Manager) of Claycots School regarding the CCTV system operation in the school
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that CCTV equipment is stored in a secure place with access by authorised personnel only
- Ensure that digital recordings are stored for a period not longer than 60 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Headteacher.
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor personal characteristics
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

The Headteacher or Business Manager will:

- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Claycots School
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that CCTV monitoring at Claycots School is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Approve the location of temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events. *NOTE: [Temporary cameras do not include mobile video equipment or hidden surveillance cameras used for authorised criminal investigations by the Police].*

- Give consideration to feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that where the Police request to set up mobile video equipment for criminal investigations, legal advice has been obtained and such activities have the approval of the Headteacher and Chairperson of the Board of Governors.

11. IMPLEMENTATION & REVIEW

The policy will be reviewed and evaluated every three years. On-going review and evaluation will take cognisance of changing information or guidelines (e.g. from the Data Protection Commissioner, the Police, Department for Education, Audit units (internal and external to the school), national management bodies, legislation and feedback from parents/guardians, pupils, staff and others.

The date from which the policy will apply is the date of adoption by the Board of Governors.

APPENDIX 1 – DEFINITIONS

Definitions of words/phrases used in relation to the protection of personal data and referred to in the text of the policy;

CCTV – Closed-circuit television is the use of video cameras to transmit a signal to a specific place on a limited set of monitors. The images may then be recorded on video tape or DVD or other digital recording mechanism.

The Data Protection Act – The Data Protection Acts 1988 and 2003 confer rights on individuals as well as responsibilities on those persons handling, processing, managing and controlling personal data. All school staff must comply with the provisions of the Data Protection Acts when collecting and storing personal information. This applies to personal information relating both to employees of the organisation and individuals who interact with the organisation

Data - information in a form that can be processed. It includes automated or electronic data (any information on computer or information recorded with the intention of putting it on computer) and manual data (information that is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system).

Personal Data – Data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

Access Request – this is where a person makes a request to the organisation for the disclosure of their personal data under Section 3 and/or section 4 of the Data Protection Acts.

Data Processing - performing any operation or set of operations on data, including:

- Obtaining, recording or keeping the data,
- Collecting, organising, storing, altering or adapting the data,
- Retrieving, consulting or using the data,
- Disclosing the data by transmitting, disseminating or otherwise making it available,
- Aligning, combining, blocking, erasing or destroying the data.

Data Subject – an individual who is the subject of personal data.

Data Controller - a person who (either alone or with others) controls the contents and use of personal data.

Data Processor - a person who processes personal information on behalf of a data controller, but does not include an employee of a data controller who processes such data in the course of their employment, for example, this might mean an employee of an organisation to which the data controller out-sources work. The Data Protection Acts place responsibilities on such entities in relation to their processing of the data.