



**Woodbrook Vale School
Policy Document**

CCTV Policy

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Headteacher's Signature: *R Fraser* Date: 07 June 2022
Print name: Rachael Fraser

Chair of Trustee's Signature: *Gavin C Brown* Date: 07 June 2022
Print name: Gavin Brown

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Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Woodbrook Vale School, hereafter referred to as 'School'.

The system comprises a number of fixed and dome cameras located around the School site. All cameras are monitored within the School.

- This Code follows Data Protection Act 1998 guidelines.
- The CCTV system is owned by the School.
- The CCTV policy is written to comply with General Data Protection Regulations (GDPR) 2018.

Objectives of the CCTV System

- (a) Protect the School buildings and their assets
- (b) Increase personal safety and reduce the fear of crime
- (c) Support the Police in a bid to deter and detect crime
- (d) Assist in identifying, apprehending and prosecuting offenders
- (e) Protect members of the public, staff, students and private property
- (f) Assist in managing the School

Statement of intent

The CCTV Scheme will seek to comply with the requirements of the General Data Protection Regulations (GDPR) 2018.

Cameras will be used to monitor activities within the School, its car parks and other public areas. It will be used to identify criminal activity or other forms of anti-social, or improper behaviour actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the School, together with its visitors.

Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Hard Drive and Digital Recording's will only be released to the media for use in the investigation of a specific crime and with the written authority of the Police. Hard Drive and Digital Recording's will never be released to the media for purposes of entertainment.

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.

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.

The School may use the recordings within school staff disciplinary or student behaviour management and exclusion processes if necessary.

Operation of the system

The scheme will be administered and managed by the Senior Leadership Team/ICT Network Manager/Site Manager, in accordance with the principles and objectives expressed in the code.

The day-to-day management will be the responsibility of the ICT Network Manager during the day.

The CCTV system will be operated 24 hours each day, every day of the year.

The Site Manager will check and confirm the efficiency of the system on a regular basis and in particular that the equipment is properly recording and that cameras are functional.

Access to the CCTV facilities will be strictly limited to the SLT, Heads of Year, Pastoral Team and the Estates/ICT Team.

Unless an immediate response to events is required, the CCTV must not direct cameras at an individual or a specific group of individuals.

The system may generate a certain amount of interest. It is vital that operations are managed with the minimum of disruption.

When not manned the facility must be kept secured.

Other administrative functions will include maintaining Hard Drive and Digital Recording's and hard disc space, filing and maintaining occurrence and system maintenance logs.

Emergency procedures will be used in appropriate cases to call the Emergency Services.

Monitoring procedures

Camera surveillance may be maintained at all times.

Monitors are installed in the ICT office to which pictures will be continuously recorded.

Hard Drive and Digital Recording's Archiving

In order to maintain and preserve the integrity of Hard Drive and Digital Recording's used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

- A Hard Drive and Digital Recording required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence store. If a Hard Drive and Digital Recording 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 controller, dated and returned to the evidence store.
- Hard Drive and Digital Recording's may be viewed by the Police for the prevention and detection of crime.
- A record will be maintained of the release of Hard Drive and Digital Recording's to the Police or other authorised applicants. A register will be available for this purpose.
- Viewing of Hard Drive and Digital Recording's by the Police must be recorded in writing and in the log book. Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.

- Should a Hard Drive and Digital Recording be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1 (iv) of this Code. Hard Drive and Digital Recording's will only be released to the Police on the clear understanding that the Hard Drive and Digital Recording remains the property of the school, and both the Hard Drive and Digital Recording and information contained on it are to be treated in accordance with this Code. The school also retains the right to refuse permission for the Police to pass to any other person the Hard Drive and Digital Recording or any part of the information contained thereon. On occasions when a Court requires the release of an original Hard Drive and Digital Recording this will be produced from the secure evidence store.
- The Police may require the School to retain the stored Hard Drive and Digital Recording's for possible use as evidence in the future. Such Hard Drive and Digital Recording's will be properly indexed and properly and securely stored until they are needed by the Police.
- Sharing with CCTV footage with agencies to actively safeguard children or adults will be done in compliance with the School's statutory obligations and procedures.
- Applications received from outside bodies (e.g. solicitors) to view or release Hard Drive and Digital Recording's will be referred to the Headteacher. In these circumstances Hard Drive and Digital Recording's will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee can be charged in such circumstances: a sum not exceeding the cost of materials.

Breaches of the code (including breaches of security)

Any breach of the Code of Practice by school staff will be initially investigated by the Headteacher, in order for him/her to take the appropriate disciplinary action.

Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

Complaints

Any complaints about the School's CCTV system should be addressed to the Headteacher.

Complaints will be investigated in accordance with Section 9 of this Code.

Access and Retention

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

Requests for Data Subject Access should be made in writing to the Headteacher.

The archive period of recordings is no longer than is necessary to achieve the objectives of the system. The archive period is a maximum of 30 days.

Covert Recording

Because fairness requires that we install signs to make individuals aware that they are entering an area where their images are recorded, it follows that failure to provide signs is a breach of the Data Protection Act.

However, we are able to rely on an exemption of the Data Protection Act which states that personal data processed for reasons of prevention and detection of crime and apprehension and prosecution of offenders are exempt. Providing that the following criteria are met:

- We have assessed that if we had to inform individuals that recording was taking place it would prejudice our objective.
- We have reasonable cause to suspect specific criminal activity is taking place.
- That covert processing is only carried out for a limited and reasonable period of time and relates to the specific suspected criminal activity or breach of student school behaviour or staff operational policies.
- We have decided in principle that we wish to adopt covert recording. We have a clear documented procedure which sets out how we determine whether the use of covert recording is appropriate in an individual case. A confidential appendix regarding our decision that covert recording is appropriate is lodged with the Headteacher.

Public Information

Copies of this Code of Practice will be available to the public from the Information Commissioners Website (ICO).

Summary of Key Points:

- This Code of Practice will be reviewed annually.
- The CCTV system is owned and operated by the School.
- The Control system is not open to visitors except by prior arrangement and good reason.
- Liaison meetings may be held with the Police and other bodies.
- Any recording Hard Drive and Digital Recording's will be used properly, indexed, stored and destroyed after appropriate use.
- Hard Drive and Digital Recording's may only be viewed by Authorised Officers and the Police.
- Hard Drive and Digital Recording's required as evidence will be properly recorded witnessed and packaged before copies are released to the Police.
- Hard Drive and Digital Recording's will not be made available to the media for commercial or entertainment purposes.
- Any breaches of this Code will be investigated by the Headteacher. An independent investigation will be carried out for serious breaches.
- Breaches of the Code and remedies will be reported to the Headteacher.
- We will maintain this policy in line with General Data Protection Regulations.