



## **CCTV Policy**

This policy will be reviewed annually to ensure compliance with current CCTV Code of Practice regulations

**Date:**                    **January 2022**

**Approved:**            **Academy Committee**

**Review:**                **January 2023**

## **Introduction**

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

The system comprises of three CCTV Camera Systems. These have a total of 15 analog external cameras, 4 IP camera's and 6 internal cameras located around the site (Annex ACCTV Data boxes are kept in Reception and the Bungalow). Access to the CCTV data is only by SLT, The Site Team and the ICT Department.

This policy follows Data Protection Act guidelines and will be subject to review annually to include consultation as appropriate with interested parties.

The CCTV system is owned by the school.

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

- To protect the school buildings and their assets
- To increase personal safety and reduce the fear of crime
- 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
- To assist in managing the school.

## **3. Statement of intent**

The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice. The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.

Cameras will be used to monitor activities within the school, its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing 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. 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 using the school's forms for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Discs will only be released to the police for use in an investigation of a specific crime.

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.

## **4. Operation of the system**

The Head of School will have overall responsibility for the scheme, in accordance with the principles and objectives expressed in the code. The day-to-day management will be the responsibility of both the Senior Leadership Team (SLT) and the Site Team during the day and the SiteTeam out of hours and at weekends.

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

## **5. Data – The data can only be accessed on the data box**

The Estates and Facilities Manager or Site Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.

Access to the CCTV Data will be strictly limited to the SLT and the Site Team. Unless an immediate response to events is required, those staff with access to the CCTV system must not direct cameras at an individual or a specific group of individuals.

Visitors and other contractors wishing to view data will be subject to particular arrangement as outlined below. SLT/Site staff must satisfy themselves over the identity of any other viewers and the purpose of the visit. Where any doubt exists access will be refused.

## **6. Liaison**

Liaison meetings may be held with all bodies involved in the support of the system.

## **7. Monitoring procedures**

Camera surveillance may be maintained at all times. A monitor is installed in Reception and on specific computers to which pictures will be continuously recorded.

## **8. Video disc procedures**

Reception – Internal camera system holds data for 6 months and is then overwritten

Reception – External camera system holds data for 18 days and is then overwritten

Bungalow – External IP camera system holds data for 14 days and is then overwritten

Recordings may be viewed by the police for the prevention and detection of crime and authorised officers of the Council. A record will be maintained of the release of recordings to the police or other authorised applicants. A register will be available for this purpose.

Viewing of recordings 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 recording be required as evidence, a copy may be released to the police under the procedures described in the above paragraph. Recordings will only be released to the police on the clear understanding that the recording remains the property of the school, and both the 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 recording or any part of the information contained thereon. On occasions when a Court requires the release of an original recording, this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the school to retain the stored discs for possible use as evidence in the future. Such discs will be properly indexed and properly and securely stored until they are needed by the police.

Applications received from outside bodies (for example solicitors) to view or release recordings will be referred to the Head of School. In these circumstances discs 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.

## **9. Breaches of the code (including breaches of security)**

Any breach of the Code of Practice by school staff will be initially investigated by the Data Protection Officer who will report to the Head of School and Chair of the Local Governing Body, in order for them to take the appropriate disciplinary action if necessary.

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.

## **10. Assessment of the scheme and code of practice**

Performance monitoring, including random operating checks, may be carried out by SLT.

## **11. Complaints**

Any complaints about the school's CCTV system should be addressed to the Head of School. Complaints will be investigated in accordance with Section 9 of this Code.

## **12. Access by the data subject**

The Data Protection Act provides data subjects (individuals to whom 'personal data' relate) with a right to data held about themselves, including those obtained by CCTV. Requests for data subject access should be made on an application form available from the Head of School.

## **13. Public information**

Copies of this policy will be available to the public from the School Office or on the website.

## **Summary of Key Points**

- This Code of Practice will be reviewed annually.
- The CCTV system is owned and operated by the school.
- Access to the CCTV system will be by SLT, ICT and Site team only
- Liaison meetings may be held with the police and other bodies.
- Recordings copied will be properly indexed, stored and destroyed after appropriate use.
- Recordings may only be viewed by authorised school officers and the police.
- Recordings required as evidence will be properly recorded witnessed and packaged before copies are released to the police.
- Recordings will not be made available to the media for commercial or entertainment.
- Discs will be disposed of securely
- Any breaches of this code will be investigated by the DPO on behalf of the Head of School. An independent investigation will be carried out for serious breaches.
- Breaches of the code and remedies will be reported to the Head of School.

**January 2021**