

CCTV Policy

(in conjunction with the Peninsula Multi Academy Trust)

Document owner	Business Manager
Frequency of review	Every 3 years
Date of last review	September 2024
Date approved by LGB	26.09.2024
Date of next review	Summer term 2027

Aims of the Policy

The purpose of this policy is to regulate the management, operation and use of the Closed-Circuit Television (CCTV) system at Weatherhead High School. CCTV systems are installed on the premises for the purpose of enhancing security of the site, buildings and equipment located on the premises. The system comprises a number of fixed and moveable cameras, located in prominent positions around the school site and within full view of persons using the school. 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, students and visitors as well as for monitoring student behaviour
- 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
- ensuring that the school rules are respected so that the school can be properly managed

The system does not have sound recording capability and is only used to record images. The external CCTV system is owned and maintained via the PFI scheme by the FM provider. The internal CCTV system is owned and maintained by the school. Where the system is adapted / extended, staff and students will be made aware. The school's CCTV is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2016/679. All employees with authorised access to images are aware of the procedures that need to be followed when accessing the recorded images and are made aware of their responsibilities in following the Information Commissioner's Office (ICO) CCTV Code of Practice

Scope of the Policy

This policy relates directly to the location and use of CCTV and the recording and subsequent use of such recorded material. The school complies with the ICO CCTV Code of Practice to ensure CCTV is used responsibly and safeguards both trust and confidence in its use. CCTV notice signs will be clearly and prominently located at the site entrance, informing site users that CCTV cameras are in operation and explaining their purpose. In areas where CCTV is used, the school will ensure that there is prominent signage. CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with school policies and related legislation, and all CCTV systems and associated equipment will be required to be compliant with this policy. Recognisable images captured by the school's CCTV systems are 'personal data'. They are, therefore, subject to the provisions of the UK General Data Protection Regulation and Data Protection Act 2018.

This policy should be read in conjunction with the following school policies:

- Safeguarding & Child Protection Policy
- Data Protection Policy

Location of Cameras

There are a number of cameras situated externally around the site and seven internal cameras. Cameras are sited so that they only capture images relevant to the purposes for which they have been installed and care will be taken to ensure that reasonable privacy expectations are not violated. The school will make sure that equipment is carefully located to ensure that the images captured comply with ICO guidance. The school will make every effort to position the cameras so

that their coverage is restricted to the school premises. The school will perform a Data Protection Impact Assessment when installing or moving CCTV cameras to consider any new privacy issues. The location of CCTV cameras will be considered carefully to enable them to fulfil the following objectives:

- Protection of school buildings and property, including the site perimeter fence, entrances and exits, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services
- Monitoring of access control systems, including site and buildings entry / exit points
- Monitoring of security systems, including intruder alarm, fire alarm, exit door controls, external alarms
- Video patrol of public areas such as car parks for traffic control purposes and entrance / exit gates
- Criminal deterrence / supporting criminal investigations (carried out by the Police)
- Deter and monitor unauthorised access to the site / trespassing
- To monitor areas that are not very visible

One internal camera is situated by the Internal Exclusion room, one internal camera is situated in the main reception area opposite the reception desk, three internal cameras are installed in the B Block corridors on the ground, first and second floors, one camera is installed by A105 in Block A and the remaining internal camera is installed in the E block ground floor corridor.

Access to and Retention of CCTV Images

Access to recorded images will be restricted to the staff authorised to view them and will not be made widely available. The Headteacher, Business Manager, Assistant Business Manager, Cover Manager, Senior Receptionist and Caretakers are password holders. Other personnel may be granted access by the Headteacher. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis. The Business Manager has overall responsibility for the maintenance of the internal CCTV system and the FM provider has responsibility for the maintenance of the external CCTV system.

The CCTV system will normally operate 24 hours each day, every day of the year and images are recorded over in a cycle normally every 25 days unless required as part of a criminal investigation or court proceedings (criminal or civil) or a Subject Access Request.

Subject Access Requests (SAR)

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the UK GDPR. All requests should be made in writing to the Data Protection Officer (DPO) in accordance with the Data Protection Policy. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified (for example, time, date and location). The applicant may view the CCTV footage if available. The school will respond to requests within one month of receiving the request. The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

Access and Disclosure of Images to Third Parties

There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police. If an order is granted by a Court for disclosure of CCTV images, then this will be complied with although careful consideration will be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Data Protection Officer will be consulted in the first instance and appropriate legal advice taken if required. Requests for the release of images should be made in writing to the Data Protection Officer.

Roles and Responsibilities

Headteacher

The Headteacher will ensure that:

- the use of CCTV systems is implemented in accordance with this policy.
- he/she maintains overall responsibility for oversight and coordination the use of CCTV monitoring for safety and security purposes within the school.
- all existing CCTV monitoring systems will be evaluated for compliance with this policy.
- the CCTV monitoring is consistent with the highest standards and protections.
- camera locations are reviewed that he will be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.
- a record of access to or the release of any material recorded or stored in the system.
- both student and staff feedback / complaints are considered regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- the privacy of individual site users, those using paths and roads adjacent to the school campus and neighbours living in residential housing do not have their 'reasonable expectation of privacy' in public and private areas is not compromised by the location and use of CCTV in the school.
- stored CCTV footage is only accessible to authorised personnel.
- camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.

The Business Manager

The Business Manager will:

- maintain the CCTV system, ensuring in particular the quality of CCTV footage is such that individuals / vehicles / other specific items can be easily identified.
- arrange for regular servicing of the CCTV system.
- ensure that CCTV footage is accurately time and date stamped.
- ensure that stored CCTV footage is destroyed in accordance with this policy.
- maintain a record of access to or the release of any material recorded or stored in the system.

The Data Protection Officer

The Data Protection Officer will:

- manage any SARs as and when they are submitted.
- liaise with the Headteacher and Business Manager to ensure compliance with ICO CCTV Code of Practice.
- ensure adequate training is in place and advise of any amendments to the ICO CCTV Code of Practice.
- engage with the ICO's Office where concerns exist regarding a data breach or potential data breach.

Governing Body

Governors will:

- review this policy every three years and monitor its implementation.

Policy Review

This policy will be reviewed every three years or when changes to legislation, national guidance, codes of practice or ICO advice may trigger an interim review.