The Polesworth School
ENSURING EXCELLENCE

# Use of the CCTV system

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| Member of leadership team with lead responsibility for oversight and update of policy | RYA |
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## Introduction

This policy has been drawn up to govern the use of CCTV in the school environment and those involved in the operation and installation of the schools CCTV system. The policy is written in conjunction with guidelines published by the Home Office and the Information Commissioners Office (ICO) 2008 on the use of CCTV in public places, as well as making reference to Warwickshire County Council guidelines for schools in the County which subscribe to support through an SLA. The school has also reviewed *The Surveillance Camera Commissioner buyers toolkit,* alongside *The ICO In the picture: A data protection code of practice for surveillance cameras and personal information.*

## The System

The CCTV system has been professionally installed by licensed specialists. Camera positions have been carefully located to ensure they are appropriate and effective whilst minimizing any collateral intrusion. It is impossible, however, to ensure that every incident will be seen or recorded. The CCTV system will be maintained in accordance with the Data Commissioners CCTV code of practice guidelines (2013) and this policy.

## Maintenance checks

- Cameras will be checked weekly to ensure that they are operational
- Recorders will be checked once a month to ensure that they are recording, and it is possible to download images
- Camera fixings will be checked to ensure safety and security, during planned maintenance
- e.g. cleaning cameras
- Repairs will be made to the system within a reasonable period of time, dependent upon cost and CCTV review

Camera images will be recorded and displayed on a CCTV monitor in the Facilities Office and Boardroom. The recording media is an electronic recorder – the images are stored on a hard drive, which is automatically overwritten after a maximum of 30 days.

## Purpose of CCTV

The system is intended to provide and promote a safe secure environment for pupils and for those who work or use the facilities of the school and to protect the school buildings and resources. It is hoped that it will also reduce the fear of crime and anti-social behaviour within the location. The system is intended to view and monitor activity in the immediate area of the school ONLY.
It shall be used for the purpose of

- Preventing and deterring crime & antisocial behaviour
- Pupil, staff and public safety
- Assisting agencies responsible in the investigation of crime & antisocial behaviour.

It will achieve this by:

- Providing evidential quality images of criminal incidents and suspects
- Assisting the responsible authorities in the investigation of crime & disorder

## Data Protection

The system shall be used in accordance to all relevant laws and guidelines, including the General Data Protection Regulations 2018 (GDPR), The Human Rights Act 1998 and if appropriate Regulation of Investigatory Powers Act 2000.

## Signage

A sign is displayed at entrance to inform staff, students and the public.

## Management of the system

The overall management of the system is the responsibility of the Governing Body of the school, who have appointed the Head of Finance and Operations and the Head teacher for the function of Data Controllers.
The CCTV system will be operated 24 hours per day, every day of the year.

## Management and operation of control equipment

The system will be managed in accordance with all relevant legislation.

## Access and Security

The day-to-day management and security of the control equipment and data is the responsibility of the Head of Finance and Operations Manager who will follow the data protection guidelines with regard to access to the 'Control Room' by visitors.

## Incident Reporting and Response

Reporting of incidents will use the register of incidents and review form (appendix B). During monitoring, if criminal or suspicious activity of a serious nature is observed then the school should immediately inform the Police. Once an incident is reported to the Police it will be dealt with in accordance with Police procedure. All other incidents will be logged and dealt with by the relevant authorities. Only authorised staff will have access to the system and the downloaded images.

## Storage of Recorded Images and their viewing

- The storage space shall be dust and moisture proof
- Viewing or copying will be carried out only in accordance within this CCTV Policy and in such circumstances as set out in the schools Data Protection Impact Assessment
- Recorded images are not to be taken away from the school premises under any circumstances with the exception being authorised bodies for example the Police
- A record of viewing and copying must be noted in the register. Appendix B
- Images saved on the hard drive of the Hikvision VCR every 30 days as per ICO advice
- Images are retained and saved on Discs for evidence if required

## The register of incidents and review

The register will include the following:

- When searching or reviewing an incident the purpose of doing so should be recorded. Also note if the search was successful or not.
- Who carried out search and/or copied of the event.
- Persons present (particularly when reviewing).
- Date, start and end time of the incident.
- Date and time of the review/copy.
- Date copy to be destroyed.
- Confirmation copy has been destroyed.

- Confirmation who destroyed, how and date.
- Details of the officer or authorized agent, collecting the copied media and their contact details.
- Date of collection along with a signature and name in block capitals, including agency.
- On occasion where the request relates to an on-going incident or investigation any appropriate reference numbers should also be included.

The Facilities Manager will make contact with the person who received the copy for evidence to confirm when and how the footage has been destroyed. This information will be added to the Register of Incidents and Review form before closing the incident and filing.

## Access to recorded information

The General Data Protection Regulations 2018 (GDPR) provides Data Subjects (individuals to whom "personal data relates") with a right to have access to CCTV images relating to them.
People can make a request to view their footage by making a Subject Access Request in writing to the school. Where Subject Access Requests are made on behalf of a data subject, a written, signed consent will be required from the subject before access to the footage is provided.

Applications received from outside bodies (e.g. solicitors or Courts) to view or release recorded data will be referred to the Head teacher who will seek legal advice if necessary. In these circumstances recordings will only be released where satisfactory documentation is produced to support the request.

A fee will be charged for the provision of stored data, £15.00 for subject access requests and a sum not exceeding the cost of materials in other cases.

## Staff training

The Headteacher shall ensure that all appropriate staff are trained on the use of the equipment and are familiar with their data protection responsibilities as detailed in the ICO's CCTV code of practice 2013

Headteacher and Facilities Manager are required to complete Data protection training on Smartlog.

## Complaints

Any complaints about the schools CCTV system should be addressed to the Head teacher.
Complaints will be investigated in accordance with the Trust complaints policy.

## Breaches of policy

Misuse of recorded imagery or the system will be a disciplinary offence.
Any breaches of the policy by school staff will be individually investigated by the Headteacher, and appropriate disciplinary actions taken.
Disciplinary action can also include prosecution under the data protection act and criminal proceedings.

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# Appendix 1

**REGISTER OF INCIDENTS AND REVIEW**

**THE POLESWORTH SCHOOL CCTV SYSTEM**

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|---|---|
| PURPOSE OF REVIEW: | |
| REVIEW COMPLETED BY: | |
| PERSONS PRESENT AT REVIEW: | |
| INCIDENT DATE AND TIMES: | |
| REVIEW SUCCESSFUL OR FAILED: | |
| COPY TAKEN BY YES OR NO: | |
| DATE COPY TO BE DESTROYED BY: | |
| CONFIRMATION COPY HAS BEEN DESTROYED BY AND DATE DESTROYED: | |
| HOW WAS COPY DESTROYED: | |
| COPY GIVEN TO POLICE OR OTHER AGENCY'S: | |
| NAME AND BADGE NUMBER OF OFFICER TAKING COPY: | |
| SIGNATURE OF OFFICER TAKING COPY: | |
| ADDITIONAL COMMENTS: | |