



Use of the CCTV System Policy

This school is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment

Governor's Committee Responsibility:

Resources

Date Approved:

Autumn 2017

Review Period:

3 yearly

Next Review Date:

Autumn 2020

The Limpsfield Grange Values:

At Limpsfield Grange we believe in working together to make a difference.

We are a tolerant community; we accept, value and understand others.

We care for all members of our community without judgement.

We are responsible for our own learning, behaviour and actions.

We accept that sometimes things go wrong. We work together to take responsibility for our mistakes and for putting things right.

We are a respectful community and we treat others as we would like to be treated, even if they have different views and opinions to our own.

We understand that good behaviour helps us to prepare for life beyond Limpsfield Grange.

We are positive and resilient. We celebrate difference in everything that we do.

We are all proud to be part of the Limpsfield Grange community.

July 2017

The Use of the CCTV System Policy

Background and rationale

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) at Limpsfield Grange School. This policy follows the guidelines published by the Home Office and the Information Commissioners Office (ICO) 2008 on the use of CCTV in public places.

Aims of the policy

- To ensure a secure and safe environment for students, staff, Governors, parents and members of the wider community who work in or access the facilities of Limpsfield Grange.
- To ensure there is a clear understanding of how we protect the school building and resources from damage and harm.

Scope

This policy applies to all people who come on to the school site including students, staff, parents, Governors, visitors, companies who hire our facilities and contractors.

The system

Camera positions have been carefully located to ensure they are appropriate and effective whilst minimising any collateral intrusion. It is impossible, however, to ensure that every incident will be seen and recorded. The CCTV system will be maintained in accordance with the Data Commissioners CCTV code of practice guidelines (2008) and this policy.

Maintenance checks

- Cameras will be checked once a week to ensure that they are operational.
- The recorder will be checked once a month to ensure it is 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 two weeks if practical, dependent upon cost and CCTV review.

Camera images will be recorded and displayed on a CCTV monitor in the Premises Manager's office. The recording media is a DVR recorder; images are stored on a hard drive which is automatically overwritten after seven days.

Viewing monitors are also available in the main school office (monitoring of gates), Admin. Office, and outside the Premises Manager's accommodation.

Purpose of CCTV

The system is intended to provide and promote a safe secure environment for students and for those who work in or use the facilities of the school; and to protect the school buildings and resources. The system is intended to view and monitor activity in the immediate area of the school only.

CCTV shall be used for the purpose of:

- Increasing the personal safety of staff, students and visitors and reduce the fear of crime.
- Protecting the school buildings and their assets.
- Supporting the Police in a bid to deter and detect crime.
- Assisting in identifying, apprehending and prosecuting offenders.
- Assisting in managing the school.

It will achieve this by:

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

Data protection

The system shall be used in accordance with all relevant laws and guidelines, including the Data Protection Act 1998, the Human Rights Act 1998 and, if appropriate, the Regulation of Investigatory Powers Act 2000.

Signage

Signs are displayed at entrance points and within the area covered by the system to inform staff, students and the public.

Management of the system

The overseeing of the system is the responsibility of the Governing Body of the school, who have appointed the Premises Manager and Headteacher for the function of Data Controllers.

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 Premises Manager who will follow the data protection guidelines with regard to access to the 'Control Room' by visitors. This responsibility will be delegated to the Premises Assistant in the absence of the Premises Manager.

Incident reporting

A register of incidents and reviews shall be stored in the Premises Manager's office and maintained by the Premises Manager who will ensure that details of any incidents relating to the use of the system are logged.

Incident response

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 the Premises Manager, Premises Assistant or members of the Senior Leadership Team will have access to the system and 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 if it would assist the school in supporting procedures for which the Headteacher is responsible or to address one of the issues in the 'purpose of CCTV'.

- Recorded images are not to be taken away from the school premises under any circumstances.
- A record of viewing and copying must be noted in the register of incidents and reviews.

Viewing of recordings by the Police must be recorded in writing 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 on the clear understanding that the recording remains the property of the school and both the recording and the information contained on it are to be treated in accordance with this policy. 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 within it.

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 securely stored until they are needed by the Police

The register of incidents and reviews

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 the search and/or copied the event.
- Persons present (particularly when reviewing).
- Date, start and end time of the incident.
- Details of the time of the review/copy.
- Details of the officer or authorised 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 ongoing incident or investigation any appropriate reference numbers should be included.

Access to recorded information

The Data Protection Act 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 review 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 Headteacher. 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, £10 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 in the use of the equipment and are familiar with their data protection responsibilities as detailed in the ICO's CCTV Code of Practice 2008.

Complaints

- Any safeguarding concerns regarding the access and use of the schools CCTV system should be recorded and reported to the DSL or a Deputy DSL

- Any complaints about the school’s CCTV system should be addressed to the Headteacher.
- Complaints will be investigated in accordance with this policy.

Breaches of the policy

- Misuse of a recorded image 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 action taken.
- Disciplinary action can also include prosecution under the Data Protection Act and criminal proceedings.

This policy will be monitored through

- The Site Manager observations
- Regular monitoring by the School Business Manager
- Headteacher reports to Governors (whenever necessary)

Related policies and documents

- Child Protection & Safeguarding Policy
- Health & Safety Policy
- Lettings Policy

This policy will be reviewed annually, and additionally in the case of the following

- Serious or frequent breaches of The Use of the CCTV Systems Policy
- New guidance from Home Office and the Information Commissioners Office
- Advice from the Police

Related links

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

<http://www.itpro.co.uk/data-protection/28085/what-is-the-data-protection-act-1998-2>

<https://www.equalityhumanrights.com/en/human-rights/human-rights-act>

Review

The Governing Body of Limpsfield Grange School adopted this policy on:

It will be reviewed on:

Signed

Dated
