

Stanborough



# CCTV POLICY

|                                   |                                    |
|-----------------------------------|------------------------------------|
| <b>Reviewed by:</b>               | <b>School – Operational Policy</b> |
| <b>Date of Issue:</b>             | <b>June 2024</b>                   |
| <b>Date of next Review:</b>       | <b>June 2025</b>                   |
| <b>Edition No:</b>                | <b>3</b>                           |
| <b>Responsible member of SLT:</b> | <b>Adam Green</b>                  |

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**Grow and Succeed**

High Expectations | Mutual Respect | Quality Learning | Success for All

Our Policy is set within the school's four principles of:

High Expectations   Quality Learning   Mutual Respect   Success for all

## 1. Introduction

Stanborough School is fully committed to operating a safe environment, it therefore has in place a closed-circuit television ("CCTV") system to assist in providing a safe and secure environment for students, staff and visitors, as well as protect school property.

The system comprises of fixed and dome cameras.

The system does not have sound recording capability.

The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.

The CCTV is monitored centrally from the Site Management office. Access to the images is controlled by IT Support and is password protected.

The purpose of this Policy is to regulate the management, operation and use of the CCTV system at the school. This document sets out the accepted use and management of the CCTV system and images to ensure the school complies with the General Data Protection Regulations and other legislation.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. Through this policy, all operators are made aware of their responsibilities in following the CCTV Code of Practice. The school will ensure that all employees are aware of the restrictions in relation to access to, and disclosure of, recorded images by publication of this policy.

## 2. Statement of Intent

The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:

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

CCTV warning signs are clearly and prominently placed at the main external entrance to the school, including further signage in other outdoor areas in close proximity to camera positions. Signs will contain details of the purpose for using CCTV (see appendix B). In areas where CCTV is used, the school will ensure that there are prominent signs placed within the controlled area.

The original planning, design and installation of CCTV equipment endeavoured to ensure that the scheme will deliver 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.

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| Reviewed by:            | Personnel Committee | Issue date: | Review date | Edition No: 3 |
| Responsible SLT member: | Adam Green          | June 2024   | June 2025   |               |
| Policy reference        | SS-POL-PER-018      |             |             | Page 2 of 8   |

### 3. Siting the Cameras

Cameras are sited so that they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the General Data Protection Regulation.

The school will make every effort to position cameras so that their coverage is restricted to the school premises, which includes outdoor/indoor areas.

CCTV will not be used in classrooms but in limited areas within the school building that have been identified by staff and students as not being easily monitored at all times.

Members of staff will have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

### 4. Covert Monitoring

It is not the school's policy to conduct 'Covert Monitoring' unless there are 'exceptional reasons' for doing so.

The school may, in exceptional circumstances, determine a sound reason to set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from a member of the senior leadership team and the school's Data Protection Officer (DPO) advised before any commencement of such covert monitoring.

Any such covert processing will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording. Covert monitoring will cease following completion of an investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles, changing areas etc.

### 5. Storage and Retention of CCTV images

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

All retained data will be stored securely at all times and permanently deleted as appropriate/required.

### 6. Access to CCTV images

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|-------------------------|---------------------|-------------|-------------|---------------|
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| Policy reference        | SS-POL-PER-018      |             |             | Page 3 of 8   |

Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available.

## 7. Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the General Data Protection Regulation.

All requests should be made in writing to the DPO. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

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.

## 8. Access to and Disclosure of Images to Third Parties

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).

The data may be used within the school's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

## 9. Complaints

Complaints regarding the CCTV system and its operation should be made under the schools complaints procedure.

## 10. Further Information

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice (published by the Information Commissioners Office)
- [www.ico.org.uk](http://www.ico.org.uk)
- UK General Data Protection Regulation

## REFERENCED POLICIES

Complaints Policy (SS-POL-PER-004)

## DOCUMENT CONTROL

| Document Control |            |                       |
|------------------|------------|-----------------------|
| Edition          | Issued     | Changes from previous |
| 1                | 19 Jun 20  | New Policy            |
| 2                | March 2021 | No changes            |
| 3                | June 2024  | No changes            |

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|-------------------------|---------------------|-------------|-------------|---------------|
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| Policy reference        | SS-POL-PER-018      |             |             | Page 4 of 8   |

## Appendix A – Checklist

Stanborough School has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of the school's community. It will not be used for other purposes. The school will conduct regular reviews of our use of CCTV.

|  | Checked<br>(Date if appropriate) | By | Date of next review |
|--|----------------------------------|----|---------------------|
| Notification has been submitted to the Information Commissioner and the next renewal date recorded.  | Yes                              |    |                     |
| There is a named individual who is responsible for the operation of the system.  | Yes                              |    |                     |
| A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.                         | Yes                              |    |                     |
| Staff and members of the school community will be consulted about any proposal to install/amend CCTV equipment or its use as appropriate.  | Yes                              |    |                     |
| Cameras have been sited so that they provide clear images.   | Yes                              |    |                     |
| Cameras have been positioned to avoid capturing the images of persons not visiting the premises.   | Yes                              |    |                     |
| There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).   | Yes                              |    |                     |
| Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.   | Yes                              |    |                     |
| The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.  | Yes                              |    |                     |
| Except for law enforcement bodies, images will not be provided to third parties.   | Yes                              |    |                     |
| The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the data controller knows to seek advice from the Information Commissioner as soon as such a request is made. | Yes                              |    |                     |
| Regular checks are carried out to ensure that the system is working properly and produces high quality images.   | Yes                              |    |                     |

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| Policy reference        | SS-POL-PER-018      |             |             | Page 5 of 8   |

## Appendix B – CCTV Signage

It is a requirement to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

### The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for any enquiries



Example sign.

|                         |                     |             |             |               |
|-------------------------|---------------------|-------------|-------------|---------------|
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| Policy reference        | SS-POL-PER-018      |             |             | Page 6 of 8   |

## Request to carry out Covert Recording

|   |  |
|---|--|
| <b>To:</b> <input type="checkbox"/> Site Management<br><input type="checkbox"/> IT Support    |  |
| <b>Authorised by:</b><br><br><b>Headteacher</b> .....(signed)<br><br><b>DPO</b> .....(signed) |  |
| <b>Reason for request:</b><br><br><br><br><br>  |  |
| <b>Location:</b><br><br><br><br><br>  |  |
| <b>Length of time required:</b><br><br><br><br><br>   |  |
| <b>Requested By:</b>  |  |
| <b>Date Requested:</b>  |  |
| <b>Signature:</b>   |  |

|   |                               |
|---|-------------------------------|
| <b>IT Manager to confirm data has been disposed of:</b> |                               |
| <b>Date:</b>  | <b>Method of Destruction:</b> |
| <b>Signed:</b>  | <b>Print Name:</b>            |

**CCTV Data Release Form**

|   |  |
|---|--|
| <b>To:</b> <input type="checkbox"/> Site Management<br><input type="checkbox"/> IT Support  |  |
| <b>Requested by:</b><br><br>Please receive this form as authority to allow CCTV data to be <u>downloaded</u> .  |  |
| <b>Reason for request, including</b> <ul style="list-style-type: none"><li>• Incident date/time and brief description of required incident</li><li>• why member of staff needs the data <u>downloaded</u></li></ul> |  |
| <b>Length of time required:</b>   |  |
| <b>Name of staff authorised to receive data:</b> .....  |  |
| <b>Authorised by:</b><br><br><b>Headteacher</b> .....(signed)<br><br><b>DPO</b> .....(signed)<br>(or member of the Data Protection Team)  |  |
| <b>Received by:</b>   |  |
| <b>Date received:</b>   |  |
| <b>Signature:</b>   |  |

|   |                               |
|---|-------------------------------|
| <b>IT Manager to confirm data has been disposed of:</b> |                               |
| <b>Date:</b>  | <b>Method of Destruction:</b> |
| <b>Signed:</b>  | <b>Print Name:</b>            |