



HOLYWELL CHURCH OF ENGLAND ACADEMY

CCTV Policy

Author	C Dinner
Responsibility	All staff and the governing body
Approved by AB Committee	February 2019
Approved by full Board of Governors:	<u>March 2019</u>
Review Date:	February 2021
Storage; (i) Electronic (ii) Hard Copy	(i) School network & school website (ii) Policy file

Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Holywell School. The system comprises a number of fixed cameras located around the School site. Live images from the system are monitored within the IT Server Room. Access to live and recorded images are password protected and therefore restricted to a limited number of Authorised Staff.

This Policy follows Data Protection Act & GDPR guidelines. The Policy will be subject to review every two years taking into account any comments from interested parties.

Statement of Intent

The School will seek to comply with the requirements both of the GDPR 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 to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the pupils, staff and visitors.

Staff that have access to the system have been instructed that cameras are not to focus on private homes, gardens and other areas of private property.

Unless an immediate, anticipated or perceived response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals (Directed Surveillance), without written authorisation being obtained from the Headteacher, 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. Images will only be released to the media for use in the investigation of a specific crime and with the written authority of the Police. Images will never be released to the media for purposes of entertainment.

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 Information Commissioner's Code of Practice have been placed at all access routes to areas covered by the Scheme.

Operation of the System

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

The Scheme will be administered and managed by the IT Technician, in accordance with the Headteacher and objectives expressed in the Code and this Policy. The day-to-day management will be the responsibility of the IT Technician.

The IT Technician is responsible for regularly checking and confirming the efficiency of the system and in particular that the equipment is properly recording and that cameras are working.

Access to the images is to be strictly controlled by a password system managed by the IT Technician. Routine viewing of recorded images is to be limited to:

- The Head teacher;
- The Deputy Head teachers;
- The Site Manager;
- The Business Manager.

When circumstances require, the Head & Deputies have authority to allow other members of staff to view recorded images. Staff other than those listed above who view the recorded images will be recorded in a Register held by the IT Technician. Viewing of images by the Police will also be recorded in the Register.

Image Control

The IT Technician is to ensure that images are only held for a maximum time required.

Cameras will be pointed and focused on several points/areas agreed in advance by the Head teacher.

Unless an immediate, anticipated or perceived response to events is required, cameras must not be directed at an individual or a specific group of individuals or used for covert surveillance.

A record will be maintained of the release of images to the Police or other authorised applicants. Requests by the Police can only be actioned under Section 29 of the Data Protection Act 1998.

Should images be required as evidence, a copy may be released to the Police under their evidence guidelines. Images will only be released to the Police on the clear understanding that the image remains the property of the School, and both the images and associated information are to be treated in accordance with the Code and this Policy. The School also retains the right to refuse permission for the Police to pass the images to any other person.

Applications received from outside bodies (e.g. solicitors) to view or release images will be referred to the Head teacher. In these circumstances images 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. A fee can be charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

Breaches of the Policy (including breaches of security)

Any breach of the Policy by school staff will be initially investigated by the Head teacher and appropriate disciplinary action will be taken. 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.

Complaints

Any complaints about the School's CCTV system should be addressed in writing to the Head teacher who will carry out the investigation.

Access by the Data Subject

The Data Protection Act & General Data Protection Regulations, 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 in writing to the Head teacher.

Public information

Copies of this Code of Practice are available to the public from the Information Commissioners Office ICO via the internet.