

Heathfield Schools' Partnership CCTV System Policy

Introduction

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Heathfield Schools' Partnership hereafter referred to as 'the school'. The system comprises of fixed cameras located in various locations inside and outside the Junior and Infant schools. The cameras are monitored from the two central control units located in each schools office and are only available to selected senior staff on the Administrative Network

This policy follows the General Data Protection Regulation (GDPR) guidelines and will be subject to review bi-annually to include consultation as appropriate with interested parties.

The CCTV system is owned by the school.

2. Objectives of the CCTV scheme

- To protect the school buildings and their assets
- To increase personal safety and reduce the fear of crime
- To support the police in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property
- To assist in managing the school.

3. Statement of intent

The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the GDPR.

Cameras will be used to monitor activities within the school, its car parks, public areas and the school roof to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the school, together with its visitors.

Cameras are sited and image capture restricted to ensure that they do not view areas that are not of interest and are not intended to be the subject of surveillance, such as individuals' private property. The cameras and systems are sited to ensure that unnecessary images are not viewed or recorded and of the appropriate quality.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Recordings will never be released to the media for purposes of entertainment.

The planning and design has endeavoured to ensure that the placement of the cameras 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 are in prominent places to let people know that surveillance cameras are in operation.

4. Operation of the system

The system will be administered and managed by the Premises Manager and Caretakers, hereinafter referred to as the Premises Team in accordance with the principles and objectives expressed in this policy. The day-to-day management will be the responsibility of the Executive Headteacher, Senior Leadership Team (SLT) and the Premises Team for out of hours and at weekends. The CCTV unit will only be available to the Executive Headteacher, SLT and the Premises Team. The CCTV system will be operated 24 hours each day, every day of the year.

5. School Office

The Premises Team will check and confirm the efficiency of the system on a regular basis and in particular that the equipment is properly recording and that cameras are functional.

Access to the school office and CCTV unit will be strictly limited to the Executive Headteacher, SLT and the Premises Team and the Administrative Team. Unless an immediate response to events is required, staff in the CCTV Control Room must not direct cameras at an individual or a specific group of individuals.

The positioning of the cameras may generate an interest from the Police and their investigations. It is vital that operations are managed with the minimum of disruption. Casual visits will not be permitted. Visitors must first obtain permission from the Executive Headteacher or their deputy and must be accompanied by them throughout the visit unless delegated to the Premises Team. Any visit may be immediately curtailed if prevailing operational requirements make this necessary.

If out of hours emergency maintenance arises, the Premises Team must be satisfied of the identity and purpose of contractors before allowing entry. A visitor's book will be maintained in the reception area. Full details of visitors including time/date of entry and exit will be recorded.

The school office will not be staffed out of hours and weekends therefore the school office must be locked. During the working day when not staffed the room must be kept secured.

The Premises Manager will carry out other administrative functions including maintaining media filing and maintaining occurrence and system maintenance logs.

Emergency procedures will be used in appropriate cases to call the Emergency Services.

6. Liaison

Liaison meetings may be held with all bodies involved in the support of the system.

7. Monitoring procedures

Camera surveillance may be maintained at all times. A hard drive is installed in each of the school offices to which pictures will be continuously recorded.

If covert surveillance is planned, it can only be undertaken by the police or the Council using the appropriate authorisation forms.

8. Recording procedures

In order to maintain and preserve the integrity of the media used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

- Each media must be identified by a unique mark.
- Before using, each media must be cleaned of any previous recording.
- The controller must register the date and time of the media including reference.
- The media used for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence store. If a media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed, signed by the controller, dated and returned to the evidence media store.
- If the media is archived the reference must be noted.

A recording may be viewed by the police for the prevention and detection of crime and authorised officers of the Council. A record will be maintained of the release of the disk to the police or other authorised applicants. A register will be available for this purpose.

Viewing of recordings by the police must be recorded in writing and in the log book. Should a recording be required as evidence, a copy may be released to the police under the procedures described in the above bullet points of section 8 of this Code. The recording will

only be released to the police on the clear understanding that the media remains the property of the school, and both the media and information contained on it are to be treated in accordance with this code. The school also retains the right to refuse permission for the police to pass to any other person the media or any part of the information contained thereon.

The police may require the school to retain the stored media for possible use as evidence in the future. Such recordings will be properly indexed and properly securely stored until they are needed by the police.

Applications received from outside bodies (for example solicitors) to view or release a recording will be referred to the Executive Headteacher. In these circumstances recordings 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.

9. Breaches of the code (including breaches of security)

Any breach of the Code of Practice by school staff will be initially investigated by the Executive Headteacher, in order for them to take the appropriate disciplinary action.

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.

10. Assessment of the scheme and code of practice

Performance monitoring, including random operating checks, may be carried out by the Premises Manager.

11. Complaints

Any complaints about the school's CCTV system should be addressed to the Executive Headteacher.

12. Access by the data subject

The GDPR provides data subjects (an individual to whom 'personal data' relates) with a right to data held about them, including those obtained by CCTV. Requests for data subject access should be made to the Executive Headteacher. The copy of the data will be provided to the individual within one month of the request.

13. The right to erasure

Under the GDPR, individuals have a right to erasure. This means someone could request that all the data captured of them through a CCTV camera is erased. The CCTV footage captured by the school is only retained for 30 days, therefore, the right to erasure will happen automatically after 30 days.

14. Public information

Copies of this policy will be available to the public from the School Offices.

Summary of Key Points

- This Policy will be reviewed every two years.
- The CCTV system is owned and operated by the school.
- The School Office will not be supervised out of school hours.
- The school office and control unit is not open to visitors except by prior arrangement and good reason.
- Liaison meetings may be held with the police and other bodies.
- Recording discs will be used properly indexed, stored and destroyed after appropriate use.
- Recordings may only be viewed by authorised Council Officers, Executive Head teacher, SLT staff, the Premises Team and the Police.

- Recordings required as evidence will be properly recorded witnessed and packaged before copies are released to the police.
- Recordings will not be made available to the media for commercial or entertainment.
- Any breaches of this code will be investigated by the Data Protection Officer (DPO) and details of the case prepared for the Executive Headteacher and Governing Body. An independent investigation will be carried out for serious breaches.

Reviewed by Resources Committee June 2018

To be reviewed summer 2020 unless alterations are made to the system

Ratified by Full Governing Body – 16th July 2018