

## **CCTV SYSTEM POLICY**

### **INTRODUCTION**

This Policy regulates the management, operation and use of the closed circuit television (CCTV) system at KHS. The system comprises a number of fixed and dome cameras located around the school site. The CCTV system is owned by the school and all cameras are monitored within the School by the duty custodians.

The policy follows the Surveillance Camera Code of Practice Pursuant to Section 30 (1) (a) of the Protection of Freedoms Act 2012. This policy will be reviewed against relevant legislation every three (3) years.

### **AIMS AND OBJECTIVES OF THE CCTV SYSTEM**

- To protect the school buildings and its assets;
- To increase personal safety and reduce 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, students, staff and their private property, and
- To assist in the management of the school.

### **SUMMARY OF KEY POINTS**

- This Code of Practice will adhere to the Surveillance Camera Code of Practice and be reviewed every three years.
- The CCTV system is owned and operated by the school.
- The Control system is not open to visitors and only to the Police by prior arrangement and good reason.
- Any recorded footage will be used properly, stored and destroyed after appropriate use.
- Video may only be viewed by Authorised School Officers and the Police.
- DVDs required as evidence will be properly recorded, witnessed and packaged before copies are released to the Police.
- DVDs will not be made available to the media for commercial or entertainment purposes.
- DVDs will be disposed of securely to ensure destruction of data.
- Any breaches of this Code will be investigated by the Headteacher. An independent investigation will be carried out for serious breaches.
- Breaches of the Code and remedies will be reported to the Headteacher and the Chair of Governors.

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## **12 GUIDING PRINCIPLES**

In line with the Surveillance Camera Code of Practice, the CCTV System Policy adopts the **12 Guiding Principles**:

- 1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.**
  - 1.1. Cameras will be used to monitor activities outside of the school buildings, the cycle storage areas, the vehicle and pedestrian entrances and its car parks. The object being to identify criminal activity when it happens, when it is anticipated, or perceived, and for the purpose of securing the safety and well-being of all users of the school site.
  - 1.2. Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose; footage will only be released to the Police. Footage will never be released to a third party unless through the actions of the Police who will evaluate all footage in relation to investigations and crime prevention.
- 2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.**
  - 2.1. No cameras will be focused on any area outside the school site and are not installed in a way that will permit them to be directed at an individual, their property or a specific group of individuals. Should the school change this practice, the school will fulfil the requirements of the Regulation of Investigatory Power Act 2000.
- 3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.**
  - 3.1. This Policy is available to the public on the school website.
  - 3.2. A camera surveillance monitor is installed in the Control facility to which pictures will be continuously recorded. Unless directly requested by the Police, covert surveillance will not take place.
  - 3.3. Any complaints about the school's CCTV system should be addressed to the Headteacher. Complaints will be investigated in accordance with this Policy and the Complaints Policy.
  - 3.4. The Data Protection Act provides Data Subjects (individuals to whom "personal data" relates) 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 Headteacher.
- 4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.**
  - 4.1. The system will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in the Code of Practice. The Headteacher will delegate certain functions to the Business Manager and Custodians.
  - 4.2. The day-to-day management will be the responsibility of the Business Manager and the Custodian team during the day.
  - 4.3. The CCTV system will operate 24 hours each day, every day of the year.

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- 5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.**
  - 5.1. Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the school CCTV.
- 6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.**
  - 6.1. Data is wiped after 9 days; no comprehensive back up on to DVD is made. A DVD back up is only made when an incident is being investigated and CCTV footage has been identified as relevant.
- 7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.**
  - 7.1. In order to maintain and preserve the integrity of recorded events from the hard drive and the following procedures will be strictly adhered to:
    - 7.1.1. Any DVD copy will be marked and a record made of when it is handed to the police.
    - 7.1.2. A DVD required for evidential purposes will be sealed, witnessed, signed by the Business Manager or Headteacher.
    - 7.1.3. Should a DVD need to be archived a reference will be noted and it will be securely stored with the Business Manager.
    - 7.1.4. The hard drive and DVD footage may be viewed by the Police for the prevention and detection of crime.
    - 7.1.5. A record will be maintained of the release of any DVD to the Police. A register will be available for this purpose.
  - 7.2. Viewing of the hard drive or the release of a DVD to the Police will be recorded in the register. Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.
- 8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.**
  - 8.1. The school Custodians will check and confirm the efficiency of the system and that cameras are functional and will bring any issues to the Site Manager.
  - 8.2. CCTV maintenance will only be carried out by the school or be prearranged with approved and identifiable contractors.
- 9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.**
  - 9.1. Access to the CCTV facilities will be strictly limited to the Senior Management Team, the Business Manager, the Custodians and any staff under the direct supervision of any of the above.
  - 9.2. Pupils will only see footage under supervision and in relation to an investigation.

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- 9.3. Other than the Headteacher, the Business Manager and the Police no other person will be left unsupervised to look at footage. Visitors to the school will not be permitted to see CCTV equipment.
  - 9.4. Unless an immediate response is required, CCTV cameras will not be directed at an individual or a specific group of individuals.
  - 9.5. When not manned the CCTV monitoring equipment will be behind a secure door.
  - 9.6. Other administrative functions will include maintaining video tapes and hard disc space, filing and maintaining occurrence and system maintenance logs
- 10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.**
- 10.1. The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.
  - 10.2. The school will treat the system and all information, documents and recordings obtained and used as data which is protected by the Act.
  - 10.3. Performance monitoring, including random operating checks, may be carried out by the Business Manager.
  - 10.4. Any breach of this Policy by school staff will be initially investigated by the Headteacher, in order for him/her to take the appropriate disciplinary action.
  - 10.5. Any serious breach of this Policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.
  - 10.6. The policy will be reviewed on a three yearly basis by the Premises Committee.
  - 10.7. Any relevant matters arising from the use of the CCTV system will be initially raised at the Premises Committee. The Premises Committee will decide if these matters merit discussion with the Whole Governing Body.
- 11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.**
- 11.1. The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency in relation to the resources available. It is not possible to guarantee that the system will cover or detect every incident taking place in the areas of coverage.
  - 11.2. Should a DVD be required as evidence, a copy may be released to the Police under the procedures described in this Policy. DVD footage will only be released to the Police on the clear understanding that the information remains the property of the school, and DVDs are subject to Data Protection Guidelines. The school also retains the right to refuse permission for the Police to pass to any other person the DVD or any part of the information contained thereon. On occasions when a Court requires the release of an original DVD this will be produced from the secure evidence store, complete in its sealed bag.
  - 11.3. Where footage is requested from outside bodies, e.g. solicitors, the request will be referred to the Head Teacher. In these circumstances footage 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 *'more than just a school'*

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Court Order. A fee can be charged in such circumstances: £10 for subject access requests or a sum not exceeding the cost of materials in other cases.

**12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.**

**12.1.** The school will not match against any database other than the current Pupil Roll which requires to be accurate and up to date.

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