



King Edward VI School

CCTV Policy and Procedure

November 2023

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Introduction

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at King Edward VI School hereafter referred to as 'the school'. The system comprises a number of fixed and dome cameras located around the school site. All cameras are monitored from the IT Office/Facilities Manager office and are only available to designated staff. This policy follows the UK General Data Protection Regulation (UK GDPR) and will be subject to review every two years to include consultation as appropriate with interested parties. The CCTV system is owned by the school. The policy for managing access to personal data is outlined in Para.12 of our Data Protection Policy. The policy for retaining and disposing of personal data is outlined in our Records Retention schedule.

2. Objectives of the CCTV scheme

- To monitor safety and to safeguard students, staff and visitors
- To protect the school buildings and their assets
- To increase personal safety and reduce the fear of crime
- To help enforce the school's Behaviour Policy
- To aid internal investigations
- To support the police in a bid to deter and detect crime and to provide evidence to law enforcement agencies, as required
- To protect members of the public and private property
- To assist in managing the school.

3. Statement of intent

The CCTV Scheme is registered with the Information Commissioner under the terms of the UK GDPR and will seek to comply with the requirements both of the UK 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 Regulation.

Cameras will be used to monitor activities within the school, its car parks and other public areas 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.

Staff have been instructed that cameras are not to focus on private homes, gardens and other areas of private property. Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained using the school's forms for Directed Surveillance to take place, 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. Footage will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Footage 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 advised by the Code of Practice of the Information Commissioner, have been placed at all access routes to areas covered by the school CCTV.

4. Operation of the system

The scheme will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in the Code of Practice. The day-to-day management

will be the responsibility of both the Senior Leadership Team (SLT) and the IT Manager during the day and the IT Team out of hours and at weekends.

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

The IT Manager will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.

All recorded images will be stored securely and deleted after 30 days unless required for evidence under a school disciplinary or legal procedure. However, washroom camera recordings are kept for four days

For the purpose of safeguarding students, maintaining good hygiene and preventing vandalism, CCTV is fitted in the washroom areas adjacent to student toilets. This is done in such a way that students' privacy is not compromised. Cameras are used monitor the following areas:

- sinks
- doors in/out of the toilet block

The cameras set up to prevent them from having any view of inside, or above, toilet cubicles or any urinals

Security measures are in place to prevent tampering with any of the camera's parameters, including location and viewing angle.

5. Access to Images

Access to the CCTV system will be strictly limited to the SLT, IT Team & Facilities Manager. Images e.g. clipped video and stills may be shared with appropriate staff to assist in the identification of individuals.

CCTV images will not be displayed on any monitor by default. The software to be used to display and review the images will only be installed on computers in the IT Office & Facilities Manager's office. Each such computer will be secured according to the school's IT Policy.

All requests to access the CCTV must be in line with the Objectives and be authorised by a member of SLT or the IT Manager.

Other administrative functions will include maintaining recordings and hard disc space.

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.

Events which occur outside of the normal working day, weekends and holidays may be reviewed in line with the objectives of this document.

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

8. Third Party Access

Recordings 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 recordings 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. 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 under the procedures described in the above bullet points of Section 8 of the Code of Practice. Recordings will only be released to the police on the clear understanding that the recording remains the property of the school, and both the recording and information contained on it are to be treated in accordance with the Code of Practice. 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 thereon. On occasions when a Court requires the release of an original recording, this will be produced from the secure evidence store, complete in its sealed bag.

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

Applications received from outside bodies (for example solicitors) to view or release recordings will be referred to the Headteacher. 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: £10.00 for subject access requests; a sum not exceeding the cost of materials in other cases.

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

Any breach of this Policy and Procedure by school staff will be initially investigated by the Headteacher which may result in disciplinary action in line with the Disciplinary Procedure.

10. Assessment of the scheme and code of practice

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

11. Complaints

Any complaints about the school's CCTV system should be addressed to the Headteacher. Complaints will be investigated in accordance with Section 9 of the Code of Practice.

12. Access by the data subject (subject access request (SAR))

The UK GDPR provides data subjects (individuals to whom 'personal data' relate) with a right to data held about themselves, including those obtained by CCTV. Requests for subject access should be submitted in writing and individuals submitting requests for access will be required to provide sufficient information to enable the footage relating to them to be identified. This will usually include date, time and location. Under UK GDPR individuals have the right to have personal data erased. This is known as the 'right to be forgotten'. The right only applies to data held at the time the request is received. It does not apply to data that may be created in the future. The individual does not have the right to be forgotten where their personal data is being processed in accordance with a legal obligation. Whilst there is a set course of erasure (images are only retained for a maximum of 31 days before being deleted automatically) any such requests within that timescale will be considered and complied with if sufficient information is provided. However, the school will not disclose this information if it:

- might cause serious harm to the physical or mental health of the student or another individual

- would reveal that the child is at risk of abuse
- would not be in the child's best interests
- is given to a court in proceedings concerning the child

13. Public information

Copies of this Procedure will be available to the public on the school website.

Summary of Key Points

- The CCTV system is owned and operated by the school
- Access to CCTV images will be strictly controlled
- Liaison meetings may be held with the police and other bodies
- Recordings will be properly indexed, stored and destroyed after appropriate use
- Recordings may only be viewed by authorised Council and school officers 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 Procedure will be investigated by the Headteacher