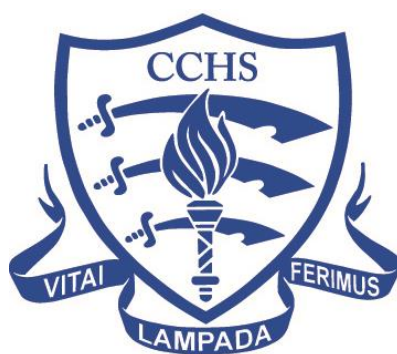


Chelmsford County High School For Girls



CCTV Policy

Last Amended: Nov 2020	Committee Responsible for Review: Facilities and Finance	
Last Approved: Oct 2018	Date of Next Review: Nov 2020	Model: School

CCTV Policy

This policy should be read with reference to the Data Protection Act 1998, the Protection of Freedoms Act 2012 and the prevailing CCTV code of practice from the Information Commissioner's Office (ICO) available at: <https://ico.org.uk/for-organisations/> and our privacy policy at: <http://www.cchs.co.uk/about-us/privacy-notices/>

Introduction

Under the Protection of Freedoms Act 2012 the processing of personal data captured by CCTV systems (including images identifying individuals) is governed by the Data Protection Act. The Information Commissioner's Office (ICO) has issued a code of practice on compliance with legal obligations under that Act. Academies should adhere to the ICO's code of practice.

The General Data Protection Regulation 2018 requires a privacy notice to be issued in respect of the use of CCTV. This must be clear and transparent in informing pupils and staff that CCTV will be in operation and about the use of any personal information collected. Access to personal information should be restricted only to staff who need particular information in order to fulfil their responsibilities. Where Academies wish to use CCTV images in order to make a decision as to whether to conduct a search for an item, this is allowed under the Education Act 2011. However, staff should follow the ICO's CCTV code of practice.

Objectives and targets

This CCTV policy explains how CCHS operates its CCTV equipment and complies with the current legislation.

Action plan

CCHS uses CCTV equipment to provide a safer, more secure environment for pupil, staff and users of the School site. Essentially it is used for:

- The prevention, investigation and detection of crime.
- The apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings).
- Safeguarding public, pupil and staff safety.
- Monitoring the security of the site.

CCHS does not use the CCTV system for covert monitoring.

Location

Cameras are located in those areas where CCHS has identified a need and where other solutions are ineffective. The CCTV system is used solely for purposes(s) identified above and is not used to routinely monitor staff conduct. Camera locations are outlined in Appendix 1.

Maintenance

The CCTV system is maintained by the CCHS Site Team and Link CCTV under an annual maintenance contract that includes periodic inspections.

The site team/contractors are responsible for ensuring:

- CCHS complies with its responsibilities in relation to guidance on the location of the camera.
- The date and time reference are accurate.
- Suitable maintenance and servicing is undertaken to ensure that clear images are recorded.
- Cameras are protected from vandalism and remain in working order.

Identification

Signage is displayed across the site to confirm that CCTV is in use.

Type of equipment

CCHS uses standard CCTV cameras to record visual images only and these do not record sound.

Administration

The Data Controller (Business Manager) has overall responsibility for the control of CCTV images at CCHS. The Site Manager, Assistant Site Manager and the Assistant Caretaker hold delegated responsibilities from the Data Controller for reviewing these images and providing access to the Designated Safeguarding Lead or her Deputies. The Academy has notified the Information Commissioner's Office (Reg No: Z3380943) of both the name of the Data Controller and the purpose for which the images are used. All operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained in their responsibilities under the CCTV Code of Practice. Access to recorded images is restricted to staff that need to have access in order to achieve the purpose of using the equipment. All access to the medium on which the images are recorded is documented by means of a log book. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images. Under the Schools (Specification and Disposal of Articles) Regulations 2013, Academy staff can view CCTV footage in order to make a decision as to whether to search a pupil for an item. If the recorded footage reveals that theft has been committed by a member of staff, this evidence may be used in a disciplinary case.

Image storage, viewing and retention

Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific times and dates to be identified. Access to live images is restricted to the CCTV operator unless the monitor displays a scene which is in plain sight from the monitored location.

Recorded images can only be viewed in a restricted area by approved staff. The recorded images are viewed only when there is suspected criminal activity and not for routine monitoring of pupils, staff or visitors unless the camera(s) are installed to monitor the safe movement of persons through a designated area eg corridors (these areas will be identifiable by clear signs).

CCHS reserves the right to use images captured on CCTV where there is activity that the school cannot be expected to ignore eg criminal activity, potential gross misconduct or behaviour which puts others at risk. Images kept for evidential purposes will be retained in a locked area accessible by the system administrator only. Where images are retained, the

system administrator will ensure the reason for its retention is recorded; where it is kept; any use made of the images; when it is destroyed.

Neither the Data Protection Act nor the Information and Records Management Society prescribe any specific minimum or maximum periods which apply to CCTV recorded images. CCHS ensures that images are not retained for longer than is necessary. Once the retention period has expired, the images are removed or erased.

Disclosure

Disclosure of the recorded images to third parties can only be authorised by the Data Controller (Business Manager), Designated Safeguarding Lead or her Deputies.

Disclosure will only be granted:

- If its release is fair to the individuals concerned.
- If there is an overriding legal obligation (eg information access rights).
- If it is consistent with the purpose for which the system was established.

All requests for access or for disclosure are recorded. If access or disclosure is denied, the reason is documented.

NB: Disclosure may be authorised to law enforcement agencies, even if a system was not established to prevent or detect crime, if withholding it would prejudice the prevention or detection of crime.

Subject access requests

Individuals whose images are recorded have a right to view images of themselves and, unless they agree otherwise, to be provided with a copy of the images. If CCHS receives a request under the Data Protection Act, it will comply with requests within 40 calendar days of receiving the request. The Academy may charge a fee for the provision of a copy of the images. If the Academy receives a request under the Freedom of Information Act, it will comply with requests within 20 working days of receiving the request. As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and its disclosure is unlikely as a Freedom of Information request. Those requesting access must provide enough detail to allow the operator to identify that they are the subject of the images, and for the operator to locate the images on the system. Requests for access should be addressed to the Data Controller, DSL. DSL Alternates and Assistant DSL.

Refusal to disclose images may be appropriate where its release is:

- Likely to cause substantial and unwarranted damage to that individual.
- To prevent automated decisions from being taken in relation to that individual.

Monitoring and evaluation

CCHS undertakes periodic audits to ensure that the use of CCTV continues to be justified. The audit includes a review of:

- Its stated purpose; the location; the images recorded; storage length, and deletion.

APPENDIX 1 – Location of cameras

Camera Ref	Location
External 1 - PTZ camera	Astro Turf and sports field Decommissioned
External 2 - PTZ camera	Science car park and astro turf Decommissioned
External 3 - PTZ camera	Music field
External 4 – Static camera	Bin enclosure and pedestrian gate
External 5 – Static camera	Visitor parking and entrance gate
External 6 – Static camera	Road to main entrance and 1 st parking bay
External 7 – Static camera	3 rd parking bay and Languages vehicle gates
External 8 – Static camera	Road leading to main exit and gate
External 9 – Static camera	Bancroft car park
External 10 – Static camera	Pond area R19/20 exit doors
External 11 – Static camera	Hall fire exit and side of Music building
External 12 – Static camera	Music car park
External 13 – Static camera	Music access road
External 14 – Static camera	Music vehicle gates
Internal 1 – Static camera	Dining entrance
Internal 2 – Static camera	Main reception
Internal 3 – Static camera	Languages entrance
Internal 4 – Static camera	Languages back corridor/ door leading to Drama
Internal 5 – Static camera	Languages Ground floor internal stairwell
Internal 6 – Static camera	Art corridor
Internal 7 – Static camera	Music foyer
Internal 8 – Static camera	School kitchen servery
Internal 9 – Static camera	New dining room
Internal 10 – Static camera	Old dining room

Appendix 2 - CCTV Log

(To be completed when images are requested)

Camera Location	Date	Start Time	Finish Time	Comments

Responsible Person: _____

Signature: _____

Date: _____