Chelmsford County High School For Girls

CCTV Policy

Approved by the Governing Body: ~~18th November 2020~~

Last Amended: November 2020	Committee Responsible for Review: Facilities and Finance	
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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 Schoolwatch 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	Entrance gate
External 2	Dining hall entrance
External 3	1st Parking bay
External 4	Junior door exit
External 5	3rd Parking bay
External 6	Exit gate
External 7	Languages to 6th Form House
External 8	Drama rear
External 9	Drama side
External 10	External science car park
External 11 – Panu vision	Bancroft 1
External 12 – Panu vision	Bancroft 2
External 13 – Panu vision	Bancroft 3
External 14 – Panu vision	Bancroft 4
External 15 – Panu vision	Sports courts 1
External 16 – Panu vision	Sports courts 2
External 17 – Panu vision	Sports courts 3
External 18 – Panu vision	Sports courts 4
External 19	Sports hall rear
External 20 – Panu vision	Music field 1
External 21 – Panu vision	Music field 2
External 22 – Panu vision	Music field 3
External 23 – Panu vision	Music field 4
External 24 – PTZ	Music field
External 25	Pond
External 26	Hall doors rear
External 27	Music car park
External 28	Kitchen access road
External 29	Music vehicle gates
Internal 1	Dining entrance
Internal 2	Main reception
Internal 3	Front corridor right
Internal 4	V19 stairwell

Internal 5	Front corridor left
Internal 6	V15 stairwell
Internal 7	Ramp corridor
Internal 8	Languages entrance
Internal 9	Language stairwell 2
Internal 10	Languages ground floor
Internal 11	Languages 1st floor
Internal 12	Languages 2nd floor
Internal 13	Languages café area
Internal 14	Languages side door
Internal 15	Drama foyer
Internal 16	Bancroft entrance 1
Internal 17	Bancroft entrance 2
Internal 18	Bancroft GF corridor
Internal 19	Bancroft 1st floor corridor
Internal 20	Sports hall entrance
Internal 21	Year 13 common room
Internal 22	6th Form study area
Internal 23	Loft
Internal 24	Year 12 common room
Internal 25	Back corridor 2
Internal 26	Back corridor 1
Internal 27	Music foyer
Internal 28	Canteen grab and go
Internal 29	Old dining hall
Internal 30	New dining hall

Appendix 2 - CCTV Log

(To be completed when images are requested)

Camera Location	Date	Start Time	Finish Time	Comments

Responsible Person: _____

Signature: _____

Date: _____