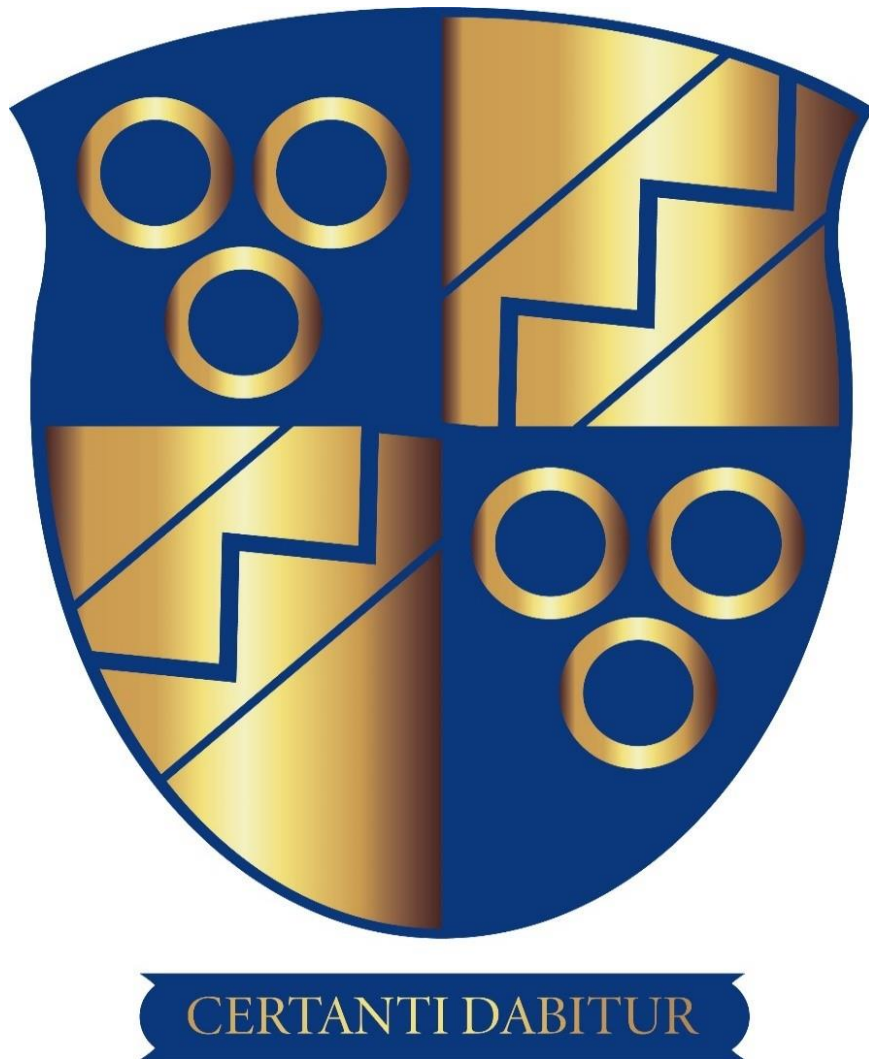


# CCTV Policy

## The Oldershaw School



**Approved by:** Finance, Audit & Risk Committee

**Date:** November 2022

**Policy owner:** Network Manager

**Last reviewed:** November 2022

**Next review due:** November 2024

## **Content**

Introduction .....	3
Aims .....	3
Statement of intent.....	4
System management.....	5
Downloading captured data on to other media .....	5
Complaints about the use of CCTV .....	6
Request for access by the data subject .....	6
Public information .....	6
Monitoring arrangements.....	6

## 1. Introduction

The school recognises that CCTV systems can be privacy intrusive.

Review of this policy shall be repeated regularly and whenever new equipment is introduced a review will be conducted and a risk assessment put in place. We aim to conduct reviews no later than every two years.

### Objectives

The purpose of the CCTV system is to assist the school in reaching these objectives:

- (a) To protect pupils, staff, and visitors against harm to their person and/or property
- (b) To increase a sense of personal safety and reduce the fear of crime
- (c) To protect the school buildings and assets
- (d) To support the police in preventing and detecting crime
- (e) To assist in identifying, apprehending, and prosecuting offenders
- (f) To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence.
- (g) To assist in managing the school.

## 2. Aims

The purpose of this Policy is to regulate the management, operation, and use of the CCTV system (closed circuit television) at the school. The CCTV system used by the school comprises of:

CAMERA TYPE	LOCATION	SOUND	RECORDING CAPACITY	SWIVEL / FIXED
Hikvision DS-96128I	Meeting Room - Reception	N	3840 X 2160 15fps	F
Hikvision DS-96128I	Reception Foyer	N	3840 X 2160 15fps	F
Hikvision DS-96128I	6 <sup>th</sup> Form Lobby	N	3840 X 2160 15fps	F
Hikvision DS-96128I	6th Form Ground Floor Ent / Ext	N	3840 X 2160 15fps	F
Hikvision DS-96128I	Maths Corridor	N	3840 X 2160 15fps	F
Hikvision DS-96128I	DT Glasshouse Exit to Yard	N	3840 X 2160 15fps	F
Hikvision DS-96128I	DT Corridor	N	3840 X 2160 15fps	F
Hikvision DS-96128I	6 <sup>th</sup> Form Common Room	N	3840 X 2160 15fps	F
Hikvision DS-96128I	Centre Exit by Principals Office	N	3840 X 2160 15fps	F
Hikvision DS-96128I	S1 – S3 Fire Escape Stairs	N	3840 X 2160 15fps	F
Hikvision DS-96128I	Reprographics Stairway	N	3840 X 2160 15fps	F
Hikvision DS-96128I	Hall Fire Exit	N	3840 X 2160 15fps	F
Hikvision DS-96128I	Site Entrance	N	3840 X 2160 15fps	F
Hikvision DS-96128I	SEND Corridor	N	3840 X 2160 15fps	F
Hikvision DS-96128I	IT6 & IT Office Passage	N	3840 X 2160 15fps	F
Hikvision DS-96128I	Humanities Stairs	N	3840 X 2160 15fps	F
Hikvision DS-96128I	S8 & Attendance Office Ent	N	3840 X 2160 15fps	F
Hikvision DS-96128I	Spielmann Foyer	N	3840 X 2160 15fps	F

Hikvision DS-g6128l	S4 – S7 Corridor	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	S1 – S3 & Prep Corridor	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Art & Music Corridor Exit	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	IT Lockup	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Sports Hall Camera	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Drama Studio D2 Lobby	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	2 <sup>nd</sup> Floor Lift Lobby	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	MFL & Staffroom Corridor	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Spielmann Fire Escape to Carpark	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Reprographics Stairs	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Link Block Foyer	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	MU1, MU2, A1 & Prep Rm Corridor	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Bike Shed by Sports Hall	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Student Services (Facing Canteen)	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Inclusion Hub & Work Room Corridor	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Main Carpark Centre View	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Spielmann Carpark	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	3 <sup>rd</sup> Floor Lift Lobby	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	1 <sup>st</sup> Floor Lift Lobby	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Spielmann Stairs	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Spielmann Balcony	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Humanities Corridor	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Carpark (from 6 <sup>th</sup> Form Centre)	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	School Field Centre View	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	School Yard (from Link Block)	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Spielmann Deli Bar	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	School Yard (from Science Block)	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Sports Hall Lobby	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	English Lobby	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Main Server Cab Room	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	IT Glass House Stairs	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	IT Office	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Corridor to IT1	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Server Room, IT3, IT4 Corridor	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Drama Studio D2 Fire Escape Stairs	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	School Canteen (Seating Area)	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Former Nursery Pathway	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Art Foyer	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Exterior Path (btn. Sports Hall & Science)	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Nursery Corridor Fire Escape	N	3840 X 2160 15fps	
Hikvision DS-g6128l	SEND Block Carpark	N	3840 X 2160 15fps	
Hikvision DS-g6128l	Dr John's (View from Servery)	N	3840 X 2160 15fps	
Hikvision DS-g6128l	Dr John's (View from Seating Area)	N	3840 X 2160 15fps	
Hikvision DS-g6128l	SEND Carpark Roadway	N	3840 X 2160 15fps	

Hikvision DS-g6128l	School Field Path (from Sports Hall)	N	3840 X 2160 15fps	
Hikvision DS-g6128l	Carpark (from Site Entrance)	N	3840 X 2160 15fps	
Hikvision DS-g6128l	Sports Hall Ext Changing Rooms Exit	N	3840 X 2160 15fps	
Hikvision DS-g6128l	School Yard (from Main Build facing DJE)	N	3840 X 2160 15fps	
Hikvision DS-g6128l	School Field Path Facing Sports Hall	N	3840 X 2160 15fps	
Hikvision DS-g6128l	School Field Path Facing 6 <sup>th</sup> Form Gate	N	3840 X 2160 15fps	
Hikvision DS-g6128l	Former Nursery Corridor	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Student Services (Facing Inclusion Hub)	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	School Canteen (Facing Servery)	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	S4– S7 Fire Escape Stairs	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Astro Carpark	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Basketball Court	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Astro Pitch 1 & 2	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Astro Pitch 4 & 3	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Data Corridor Facing Principal Office	N	3840 X 2160 15fps	F
Hikvision DS-g6128l	Data Corridor Facing Library	N	3840 X 2160 15fps	F

### 3. Statement of intent

Notification has been submitted to the Information Commissioner and the next renewal date has been recorded.

The CCTV system will seek to comply with the requirements of both the General Data Protection Regulation Act, and the most recent Commissioner's Code of Practice.

The school will treat the system, all information, documents, and recordings (both those obtained and those subsequently used) as data protected under the Act.

The system has been designed so far as possible to deny observation on adjacent private homes, gardens, and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design has endeavoured to ensure that the system 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 required by the Code of Practice of the Information Commissioner will be clearly visible on the site and make clear who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

Recorded images will only be retained long enough for any incident to come to light (e.g., for a theft to be noticed) and the incident to be investigated. In the absence of compelling a need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than **31 days (one calendar month)**.

### 4. System management

Access to the CCTV system and data shall be password protected.

The CCTV system will be administered and managed by the **Network Manager** who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager the system will be managed by the **Buildings Manager**.

In addition to the above, 2 authorised operators have access to the system, Michael Taylor (Caretaker), Clifford Maxwell (Caretaker), and Aidan Wilcox (ICT Technician). There are currently only 2 areas on the site where the system can be accessed: The IT Office (located at the top of the building on the IT corridor), and the Site Office (located adjacent to the main hall).

The system and the data collected will only be available to the Systems Manager, his/her replacement, appropriate members of the senior leadership team, and the pastoral staff. Additional authorised operators as determined by the Executive Team.

The CCTV system is designed to be in operation **24 hours a day 7 days a week. Night mode stops recordings unless motion is detected**, though the school does not guarantee that it will be working during these hours.

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

Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by providing clear, usable images.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Powers Act 2000.

Where a person other than those mentioned in paragraph 5.3 above, requests access to the CCTV data or system, the System Manager must satisfy him/herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists access will be refused.

Details of all visits and visitors will be recorded in a system log book including time/data of access and details of images viewed and the purpose for so doing.

## 5. Downloading captured data on to other media

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any download footage used to record events from the DNR must be prepared in accordance with the following procedures: -

- (a) Each piece of downloaded footage must be identified by a unique mark.
- (b) The System Manager will register the date and time of each piece of downloaded footage, including its reference.
- (c) Downloaded footage required for evidential Police purposes will be uploaded to the secure **Digital Police Portal** (Powered by NICE Investigate). Links to this are provided on a per case basis and expire after a maximum 24hours. If a physical copy of the download is required then this must be sealed, witnessed, and signed by the System Manager. This copy will then be dated and stored in a separate secure evidence store for no longer than is necessary.
- (d) If downloaded footage is archived the reference must be noted.

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his/her replacement and the Headteacher and other authorised senior leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable, if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or upload to the **Digital Police Portal** of any downloaded footage to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the downloaded footage (and any images contained thereon) remains the property of the school, and downloaded footage (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the police to pass the downloaded footage (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded footage this will be produced from the secure evidence store, complete in its sealed bag.

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

Applications received from outside bodies (e.g. solicitors or parents) to view or release images will be referred to the school's Data Protection Officer and a decision made by a senior leader of the school in consultation with the school's data protection officer.

## **6. Complaints about the use of CCTV**

Any complaints in relation to the school's CCTV system should be addressed to the Principal.

## **7. Request for access by the data subject**

The Data Protection Act provides Data Subjects – those whose image has been captured by the CCTV system and can be identified - with a right to data held about themselves, including those obtained by CCTV. Requests for such data should be made to the Chief Finance & Operations Officer.

## **8. Public information**

Copies of this policy will be available to the public from the school office.

## **9. Monitoring arrangements**

This policy will be reviewed bi-annually and approved by the Trust board.