NESTON HIGH SCHOOL

# CCTV Policy

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|---|---|
| Policy owners/leads: | JCD/TPH |
| Notes: | Key |
| Statutory: | Yes |
| Website: | Yes |
| Review period: | 3 Yearly |

| Date | Action | Comments / Follow Up |
|---|---|---|
| Feb 2018 | Policy adopted | Next review: Feb 2021 |
| Feb 2021 | Policy reviewed. JCD | Next review: June 2024 |
| May 2024 | Policy reviewed. JCD | Next review: June 2027 |
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NESTON HIGH SCHOOL

# 1. POLICY INTRODUCTION

1.1 The purpose of this document is to regulate the management, operation, and use of CCTV systems in our School.

1.1.1 Neston High School uses a Closed-Circuit Television (CCTV) system to:

1.1.2 Maintain a safe and secure environment for pupils, staff, and visitors.

1.1.3 Deter criminal acts against persons and property.

1.1.4 Assist the police in identifying persons who have committed an offence.

1.1.5 Prevent the loss or damage to property and to assist in the investigation of accidents, incidents and near misses.

1.1.6 Assist in the investigation of breaches of its codes of conduct and policies by staff, students, and contractors and where relevant and appropriate for investigating complaints.

1.2 This policy seeks to ensure that the CCTV system used at Neston High School is operated in compliance with the law relating to data protection. Namely the General Data Protection Regulations ("GDPR") and the Data Protection Act 2018 ("DPA 2018") which includes the principles governing the processing of personal data. It also seeks to ensure compliance with privacy law. It considers best practice as set out in codes of practice issued by the Information Commissioner and by the Home Office.

1.3 This policy will be reviewed annually by the IT Services Manager and SLT to assess compliance with clauses 1.1 and 1.2 and to determine whether the use of the CCTV system remains justified.

# 2. STATEMENT OF INTENT

2.1 Neston High School make use of both live stream and recorded CCTV images for purpose outlined in Section 1.

2.2 Neston High School complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The checklist of operation (Appendix 1) is adapted from this document.

2.3 CCTV warning signs will be clearly and prominently placed at main entrances to the School. In high-risk areas, for which Neston High School use CCTV for the purpose outlined in Section 1, the school will place additional warning signs as a reminder that CCTV is in operation.

2.4 The surveillance system has been designed for maximum effectiveness and efficiency; however, the school cannot guarantee that every incident will be detected or covered and 'blind-spots' may exist.

2.5 CCTV data will not be used in any aspect of performance management, unless with the written consent of the employee concerned.

# 3. SYSTEM DESCRIPTION

3.1 The system comprises of several fixed and dome cameras. The CCTV systems installed in and around Neston High School's estate, building entrances, car parks, perimeters, reception areas, external areas such as courtyards & playgrounds, internal areas such as social spaces, large multi-use rooms/areas, corridors, owned and hired minibuses, and any high-risk areas Neston High School identify relating to the purpose outlined in Section 1.

3.2 The system is a closed digital system and does not have sound recording capability. The surveillance system will not be trained on specific individuals unless an immediate response to an incident is required.

3.3 The system continuously records CCTV images on to hard drives. Standard retention period of continuities recordings is 10 days, after which footage is overwritten. When footage is reviewed the retention period increases as detailed in Appendix 1.

3.4 The CCTV system is owned and operated by Neston High School and the deployment of which is determined by the School's IT Services Manager and Leadership team.

3.5 The CCTV is monitored by key security staff and senior leaders. The system is encrypted, and password protected.

3.6 The CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. Registration Number: Z7120622. The use of CCTV, and the associated images/recordings, is covered by the Data Protection Act 2018, which includes the rules set out in the General Data Protection Regulation. This policy outlines the School's use of CCTV and how it complies with the Act.

3.7 All authorised operators and employees approved to access images are aware of the procedures that need to be followed when accessing the recorded image. All operators are trained by the School's data controller in their responsibilities as part of the requirements of this policy document, the School's safeguarding policies and procedures, e-safety information, and the Data Protection Act. All employees are aware of the restrictions in relation to storage of, access to, and disclosure of, recorded images and sound. Failure to adhere to these requirements could lead to disciplinary action.

# 4. SITING THE CAMERAS

4.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that civil rights and privacy are not violated. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. Cameras will be regularly checked to ensure they have not been moved or tampered with in any way.

4.2 The School will make every effort to position cameras so that their coverage is restricted to the School's premises, which include outdoor areas.

4.3 The School uses portable CCTV cameras on school-owned and school-hired minibuses.

4.4 CCTV will not be used in classrooms apart from large multi-use areas listed in Appendix 2.

4.5 Members of staff upon request will have access to details of where CCTV cameras are situated, except for cameras placed for the purpose of covert monitoring (Section 5).

4.6 Only suitably competent contractors with the relevant knowledge and experience will be employed to install and maintain the equipment.

# 5. COVERT MONITORING

5.1 No fixed cameras are sited for covert use (i.e. recording which takes place without the individual's knowledge). Covert monitoring is not actively or routinely used. This type of monitoring is only considered or used in exceptional circumstances, for example:

5.1.1 Where there is good cause to suspect that a criminal activity or equivalent malpractice which may constitute gross misconduct.

5.1.2 Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

5.2 In these circumstances, written authorisation must be obtained from the Board of Trustees before allowing such an operation to take place. Unless the Board of Trustees is instructed otherwise (e.g. in a police investigation), members of the JCNC ('Joint Consultative and Negotiation Committee' as referred to in the TUC Model Agreement for Academies) will be informed confidentially about any plans for covert monitoring.

5.3 Covert monitoring must cease following completion of an investigation.

5.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilets or changing areas.

# 6. Active CCTV Monitoring ('Live viewing')

6.1 Access to live CCTV image feeds is limited to the Headteacher, IT Services Manager, Premises Manger, Business Manager, and designated PLM members. Additional access many also be authorised by the Headteacher.

6.2 A list of named staff authorised to view live images feeds from this CCTV system will be held by the School.

# 7. ACCESS TO CCTV RECORDINGS ('PLAY BACK')

7.1 Access to recorded/exported CCTV images is limited to Senior leaders, IT Services team, Premises team, PLM team, and those whose access is authorised by the Headteacher.

7.2 A list of named staff authorised to access recorded images from this CCTV system will be held by the School.

7.3 A log will be maintained of when CCTV images are accessed and reviewed (name of reviewer, date & reason).

# 8. STORAGE AND RETENTION OF CCTV IMAGES

CCTV images are securely retained according to their status, outlined here:

8.1 **Continuous Status**: CCTV images are continuously recorded from the live feeds on secure hard drives. These recordings are stored for 10 days before being automatically deleted/written over.

8.2 **Exported Status**: When recorded CCTV images are viewed, (as per 7.1), the viewed images may be (at the request of the viewer or Senior leaders), exported. CCTV Images will only be exported when they form part of an investigation or are evidence relating to the purpose for which CCTV images are captured (as per 1.1). When an export has been requested, the CCTV images are securely stored for 3 calendar months.

8.2.1 After 3 calendar months, the reason for retention of the exported CCTV images is reviewed. Stored CCTV images would then be securely deleted unless the decision is taken to Archive the CCTV Images (as per 8.3).

8.3 **Archived Status**: Senior Leaders may request that exported CCTV images are retained for longer than 3 calendar months. Hard copies may also be stored in school safe. CCTV Images may be further retained because:

8.3.1 They form part of an incident still under investigation.

8.3.2 Are evidence of unsafe, improper, or poor behaviour/conduct.

8.3.3 Are requested to be retained for extraordinary reasons, which will be documented.

8.4 When recorded images are kept longer than 3 months (archived), the reason for this is documented in the CCTV log with a further review date

8.5 Archived CCTV images reviewed as per the individual review date documented (as per 8.3) where their archived status will be re-evaluated, and their further retention or secure deletion will be decided upon and documented.

8.6 While retained, the integrity of the CCTV images will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

8.7 All retained data will be stored securely. Access will be limited to Senior leaders, IT Services, and those whose access is authorised by the Headteacher.

# 9. SUBJECT ACCESS REQUESTS (SAR)

9.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

9.2 All requests must be made in writing to the Headteacher. Individuals submitting requests for access will have to provide sufficient information to enable the footage relating to them to be identified & isolated. For example, date, time, and location.

9.3 The School may charge a fee where the request is manifestly unfounded or excessive. For example, where repetitive requests are made, or further copies of the same information are requested.

9.4 The School will respond to requests within 1 calendar month of receiving the written request and any fee.

9.5 The School reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation. Where images of other individuals are on the CCTV footage their permission will be sought before access is allowed.

## 10. ACCESS TO AND DISCLOSURE OF IMAGES TO THIRD PARTIES

10.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the School where these would reasonably need access to the data (e.g. investigators).

10.2 Requests should be made in writing to the Headteacher.

10.3 The data may be used within the School's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

## 11. COMPLAINTS

11.1 Complaints and enquiries about the operation of CCTV within the School should be directed to the Headteacher.

11.2 Failure of authorised operators/staff to comply with the requirements of this policy will lead to disciplinary action under the Trust's disciplinary procedure.

## 12. FURTHER INFORMATION & GUIDANCE

12.1 Further information and guidance on CCTV and its use is available from the following sources:

12.1.1 Data Protection Code of Practice for surveillance cameras and personal information 2015 published by the Information Commissioners Office (www.ico.org.uk)

12.1.2 The Government's Surveillance Camera Code of Practice 2013: (www.gov.uk)

12.1.3 Guidance on conducting a privacy impact assessment (www.ico.org.uk)

12.1.4 Regulation of Investigatory Powers Act (RIPA) 2000

12.1.5 Data Protection Act 2018 (Encompassing the General Data Protection Regulation 2016/679)

12.1.6 Freedom of Information Act 2000

12.1.7 Protection of Freedoms Act 2012

12.1.8 Crown Prosecution Service (www.cps.gov.uk)

## 13. REVIEW

13.1 This policy will be reviewed every 3 years, or sooner if required due to changes in legislation or statutory guidance.

# 14. APPENDIX 1: CHECKLIST OF OPERATION

14.1 The School's CCTV system and the images produced by it are controlled in line with our policy, our data controller will notify the Information Commissioner about the CCTV system and its purpose.

14.2 The School has considered the need for using CCTV and has decided it is required for the prevention and detection of crime and for protecting the safety of users of the site. We conduct regular reviews of our use of CCTV.

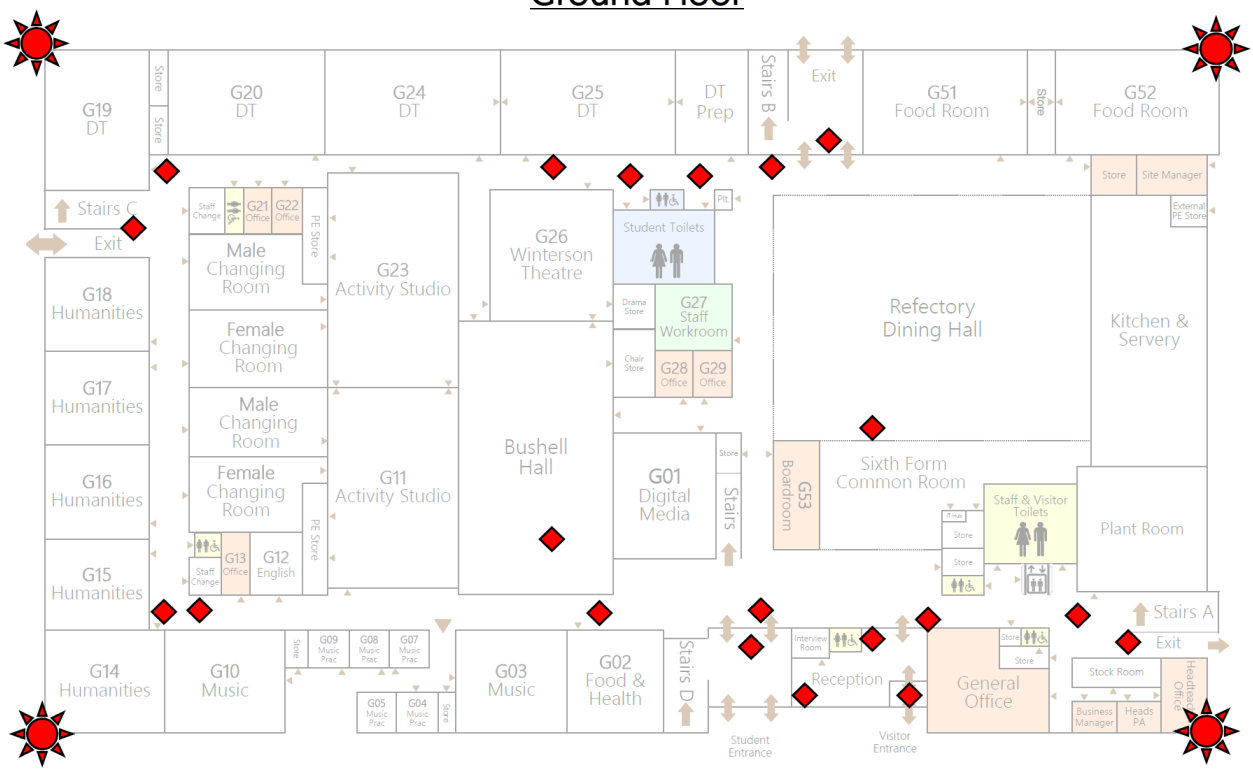
| Action | Date | Print Name | Review Date |
|---|---|---|---|
| Notification has been submitted to the Information Commissioner and the next renewal date recorded. | May 2024 | T Phillips | May 2027 |
| The name of the individual responsible for the operation of the system is: James Caldwell | May 2024 | J Caldwell | May 2027 |
| The reason for using CCTV has been clearly defined and installation / use of cameras is the best solution. | May 2024 | J Caldwell | May 2027 |
| The system is checked to verify it produces clear images which the law enforcement bodies (usually the police) can use to investigate crime, these can easily be taken from the system when required. | May 2024 | J Caldwell | May 2027 |
| Cameras have been sited so that they provide clear images and limit the opportunity to be tampered with. | May 2024 | J Caldwell | May 2027 |
| The potential impact on individuals' privacy has been identified and taken in to account in the use of the system. | May 2024 | J Caldwell | May 2027 |
| Cameras are located in the following areas: (see attached map) | May 2024 | J Caldwell | May 2027 |
| Cameras have been positioned to avoid intentionally capturing the images of persons not visiting the premises. | May 2024 | J Caldwell | May 2027 |
| There are visible signs showing that CCTV is in operation. Where it is not obvious, signs will detail who is responsible for the system contact details are displayed on the sign(s). | May 2024 | J Caldwell | May 2027 |
| Reviewed Images from this CCTV system ('played back') are securely stored electronically in a restricted area. | May 2024 | J Caldwell | May 2027 |
| Exported CCTV Images will be deleted in line with their retention status (as per section 8) | May 2024 | J Caldwell | May 2027 |
| Procedures are in place to respond to the police or individuals making requests for access to data held. | May 2024 | J Caldwell | May 2027 |
| Regular checks are carried out to ensure that the system is working properly and produces high quality images. | May 2024 | J Caldwell | May 2027 |

# 15. APPENDIX 2: CAMERAS IN MULTI-USE SPACES

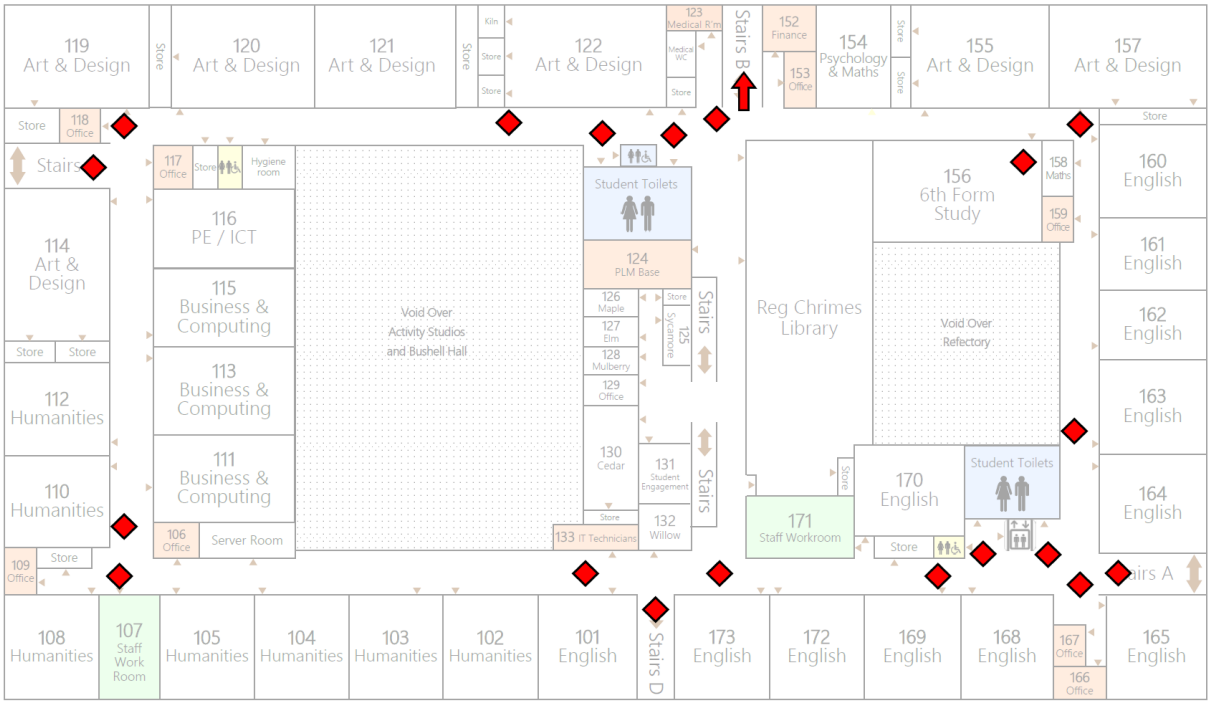
- Bushell Hall
- 156 (Sixth form LRC)
- Refectory
- Outdoor teaching areas

# 16. APPENDIX 3: FIXED CAMERA LOCATIONS

## Ground Floor




## 1st Floor



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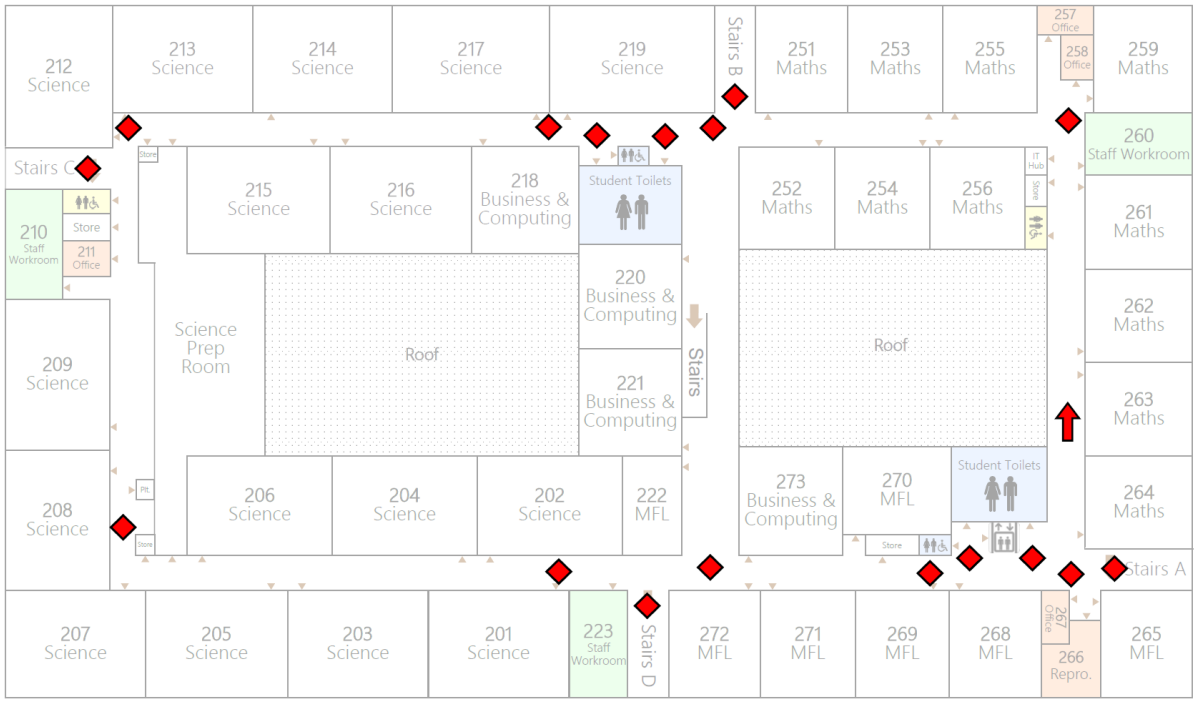
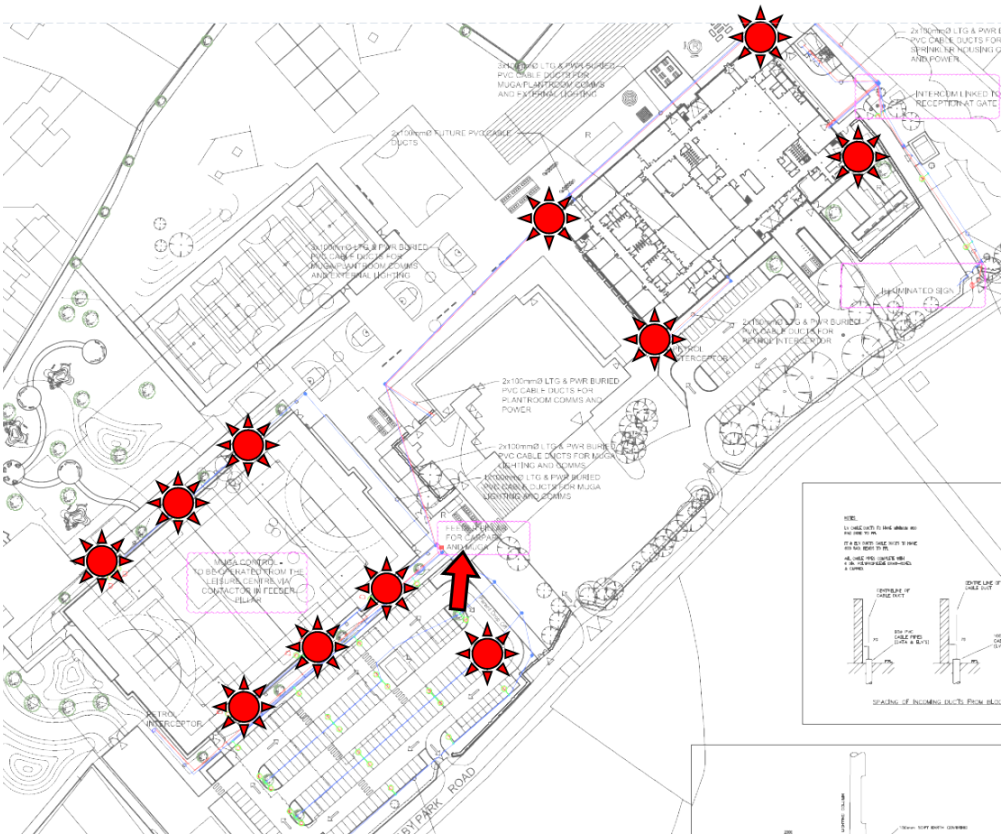
# 2nd Floor




## External