

BIDDICK HALL JUNIOR SCHOOL

CCTV POLICY

Adopted: March 2020

(Any reference to 'Governing Body' and 'Governors' is applicable to the Governing Body or Interim Executive Board of BIDDICK HALL JUNIOR School and their respective appointed members.)

Introduction

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at BIDDICK HALL JUNIOR School, hereafter referred to as 'the School'.

The system comprises of a total of THREE fixed cameras which are located at the main PLAYGROUND of the School. All cameras are monitored from a Central Control point and are only available to selected senior staff.

This policy follows Data Protection Act guidelines.

The policy will be subject to review bi-annually.

The CCTV system is owned by the School. It was installed by 20/20 VISION TECHNOLOGY on behalf of the School and we have a maintenance contract with them.

Objectives of the CCTV scheme

- To protect pupils and staff in the School
- To protect the School buildings and their assets
- To deter potential criminal offenders
- To increase personal safety and reduce the fear of crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property
- To assist in managing the School

The School has a statutory responsibility for the protection of its property, equipment and other plant as well providing a sense of security to its employees, students and invitees to its premises. The School owes a duty of care under the provisions of Safety, Health and Welfare at Work Act 2005 and associated legislation, and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life of the school community.

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.

Statement of intent

The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.

The Data Protection Act requires that data is "limited to only what is necessary for the purpose for which it is collected". This means that the School needs to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV to control the perimeter of the school buildings for security purposes has been deemed to be justified by the board of management. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

Operation and maintenance of the system

The CCTV system will be administered and managed by the Head of School.

The day-to-day management will be the responsibility of the Head of School.

The Control Points will only be staffed by persons nominated by the Head of School.

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

The system for the School was installed by 20/20 VISION TECHNOLOGY and is maintained by them.

Cameras are focused on the main PLAYGROUND areas.

Sound will not be recorded.

Control Points

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

Access to the CCTV Controls will be strictly limited to nominated staff.

Adequate signage will also be prominently displayed at the entrance to the School property. Signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.

Monitoring procedures

Camera surveillance can be maintained at all times.

There is one monitor point in the Head of School's Office.

When reviewing any incidents, no one other than personnel authorised by the Head of School should be present when reviewing any CCTV footage.

Recording procedures

Any recording required for evidential purposes must be sealed, witnessed, signed by the Head of School, dated and stored in a separate, secure, evidence bag.

No one other than authorised personnel should be present when a recording is made, or when an incident is viewed.

Recordings may be viewed by the Police for the prevention and detection of crime.

A record will be maintained of the release of recordings to the Police or other authorized applicants.

Requests by the Police can only be actioned if they comply with the requirements of the Data Protection Act 2018.

Should a recording be required as evidence, a copy may be released to the Police as described in paragraph one above. Recordings will only be released to the Police on the clear understanding that it remains the property of the School, and both the recording and information contained on it are to be treated in accordance with this policy.

The School also retains the right to refuse permission for the Police to pass to any other person the tape or any part of the information contained thereon. On occasions when a Court requires the release of an original recording, this will be provided by the School.

The Police may require the School to make and retain recordings for possible use as evidence in the future. Such recordings will be securely stored until they are needed by the Police.

Applications received from outside bodies (e.g. solicitors) to view or release recordings will be referred to the Head of School. In these circumstances recordings 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.

Storage and Retention

The Data Protection Act states that data "shall not be kept for longer than is necessary for" the purposes for which it was obtained. A data controller needs to be able to justify this retention period. For a normal CCTV security system, it would be difficult to justify retention beyond a month (28 days), except where the images identify an issue – such as a break-in or theft and those particular

images/recordings are retained specifically in the context of an investigation/prosecution of that issue.

Accordingly, the images captured by the CCTV system will be retained for a maximum of 28 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel.

Training

Training will be given to those individuals that have been chosen by the Head of School to monitor and or replay incidents.

Breaches of the code (including breaches of security)

Any breach of the CCTV policy by School staff will be initially investigated by the Head of School, in order for him/her to take any appropriate disciplinary action.

Any serious breach of the CCTV Policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

Complaints

Any complaints about the School's CCTV system should be addressed to the Head of School.

Complaints will be investigated in accordance with this policy.

Access by the Data Subject

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV. Requests for Data Subject Access should be made in writing to the Head of School.

Public information

Copies of this policy will be available to the public from the School website or from the School office.

Further Information

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

CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)

www.ico.gov.uk

Regulation of Investigatory Powers Act (RIPA) 2000

Data Protection Act 2018