



## CCTV POLICY

**Term of policy:** 3 Years

**Approved by:** BoT

**Date ratified:** BoT 10.12.2024

**Next Review Date:** Spring 2027

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**Sources:** NGA, The Key

**Online location:** Policies

**Consulted with JCC?** Yes  No

### Introduction

This policy replaces any previous policy and follows the DfE regulations.

**As part of our commitment to meet the Public Sector Equality Duty (PSED) requirement, to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations, we have carefully considered the impact of this policy on equality. The school will ensure that this policy is applied fairly to all employees and does not have a negative impact on students or staff with protected characteristics, race, sex, religion and belief, sexual orientation, age, disability, gender reassignment, marriage and civil partnership and pregnancy and maternity.**

## Introduction

The school recognises that CCTV systems can be privacy intrusive.

For this reason, the school has carried out a data protection impact assessment with a view to evaluating whether the CCTV system in place is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the data protection impact assessment has informed the school's use of CCTV and the contents of this policy.

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 students, 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.

## Purpose of This Policy

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 NUMBER	CAMERA TYPE	LOCATION	SOUND	RECORDING CAPACITY	SWIVEL / FIXED
1	Hikvision ColourVu Bullet	Block E - External	No	Yes	Fixed
2	Hikvision ColourVu Bullet	Block E - External	No	Yes	Fixed
3	Hikvision ColourVu Bullet	Block E - External	No	Yes	Fixed
4	Hikvision ColourVu Bullet	Block E - External	No	Yes	Fixed
5	Hikvision ColourVu Bullet	Block B - External	No	Yes	Fixed
6	Hikvision ColourVu Bullet	Block B - External	No	Yes	Fixed
7	Hikvision ColourVu Bullet	Block B - External	No	Yes	Fixed
8	Hikvision ColourVu Bullet	Block B - External	No	Yes	Fixed
9	Hikvision ColourVu Bullet	Block B - External	No	Yes	Fixed
10	Hikvision ColourVu Bullet	Block J - External	No	Yes	Fixed
11	Hikvision ColourVu Bullet	Block J - External	No	Yes	Fixed
12	Hikvision ColourVu Bullet	Block J - External	No	Yes	Fixed
13	Hikvision ColourVu Bullet	Block J - External	No	Yes	Fixed
14	Hikvision ColourVu Bullet	Block A - External	No	Yes	Fixed
15	Hikvision ColourVu Bullet	Block A - External	No	Yes	Fixed
16	Hikvision ColourVu Bullet	Block A - External	No	Yes	Fixed
17	Hikvision ColourVu Bullet	Block A - External	No	Yes	Fixed
18	Hikvision ColourVu Bullet	Block A - External	No	Yes	Fixed
19	Hikvision ColourVu Bullet	Block A - External	No	Yes	Fixed
20	Hikvision ColourVu Bullet	Block A - External	No	Yes	Fixed

21	Hikvision ColourVu Bullet	Block A - External	No	Yes	Fixed
22	Hikvision ColourVu Bullet	Block A - External	No	Yes	Fixed
23	Hikvision ColourVu Bullet	Block T - External	No	Yes	Fixed
24	Hikvision ColourVu Bullet	Block C - External	No	Yes	Fixed
25	Hikvision ColourVu Bullet	Block C - External	No	Yes	Fixed
26	Hikvision ColourVu Bullet	Block C - External	No	Yes	Fixed
27	Hikvision ColourVu Bullet	Block C - External	No	Yes	Fixed
28	Hikvision ColourVu Bullet	Block C - External	No	Yes	Fixed
29	Hikvision ColourVu Bullet	Block A - External	No	Yes	Fixed
30	Hikvision ColourVu Bullet	Block T - Internal – 1st Floor	No	Yes	Fixed
31	Hikvision ColourVu Bullet	Block E - Internal - Ground Floor	No	Yes	Fixed
32	Hikvision ColourVu Bullet	6 <sup>th</sup> Form Centre EG2 - Block E - Internal - Ground Floor	No	Yes	Fixed
33	Hikvision ColourVu Bullet	Block B - Internal - Ground Floor	No	Yes	Fixed
34	Hikvision ColourVu Bullet	Block B - Internal - Ground Floor	No	Yes	Fixed
35	Hikvision ColourVu Bullet	Block B - Internal - Ground Floor	No	Yes	Fixed
36	Hikvision ColourVu Bullet	Reception - Block B - Internal - Ground Floor	Yes	Yes	Fixed
37	Hikvision ColourVu Bullet	Block B - Internal - Ground Floor	No	Yes	Fixed
38	Hikvision ColourVu Bullet	Room BG14 - Block B - Internal - Ground Floor	No	Yes	Fixed
39	Hikvision ColourVu Bullet	Room BG15 - Block B - Internal - Ground Floor	No	Yes	Fixed
40	Hikvision ColourVu Bullet	Hall - Block B - Internal - Ground Floor	No	Yes	Fixed
41	Hikvision ColourVu Bullet	Block B - Internal - Ground Floor	No	Yes	Fixed
42	Hikvision ColourVu Bullet	Block B - Internal - Ground Floor	No	Yes	Fixed
43	Hikvision ColourVu Bullet	Block B - Internal - Ground Floor	No	Yes	Fixed
44	Hikvision ColourVu Bullet	Block J - Internal - Ground Floor	No	Yes	Fixed
45	Hikvision ColourVu Bullet	Block J - Internal - Ground Floor	No	Yes	Fixed
46	Hikvision ColourVu Bullet	Block J - Internal - Ground Floor	No	Yes	Fixed
47	Hikvision ColourVu Bullet	Block J - Internal - Ground Floor	No	Yes	Fixed
48	Hikvision ColourVu Bullet	Canteen - Block J - Internal - Ground Floor	No	Yes	Fixed
49	Hikvision ColourVu Bullet	Canteen - Block J - Internal - Ground Floor	No	Yes	Fixed
50	Hikvision ColourVu Bullet	Block A - Internal - Ground Floor	No	Yes	Fixed
51	Hikvision ColourVu Bullet	Block A - Internal - Ground Floor	No	Yes	Fixed
52	Hikvision ColourVu Bullet	Block A - Internal - Ground Floor	No	Yes	Fixed
53	Hikvision ColourVu Bullet	Block A - Internal - Ground Floor	No	Yes	Fixed
54	Hikvision ColourVu Bullet	Block A - Internal - Ground Floor	No	Yes	Fixed
55	Hikvision ColourVu Bullet	Block A - Internal - Ground Floor	No	Yes	Fixed
56	Hikvision ColourVu Bullet	Block A - Internal - Ground Floor	No	Yes	Fixed
57	Hikvision ColourVu Bullet	Block A - Internal - Ground Floor	No	Yes	Fixed
58	Hikvision ColourVu Bullet	Block A - Internal - Ground Floor	No	Yes	Fixed
59	Hikvision ColourVu Bullet	Room TF4 - Block T - Internal - 1st Floor	No	Yes	Fixed
60	Hikvision ColourVu Bullet	Room TF2 - Block T - Internal - 1st Floor	No	Yes	Fixed
61	Hikvision ColourVu Bullet	Room TF1 - Block T - Internal - 1st Floor	No	Yes	Fixed
62	Hikvision ColourVu Bullet	Block B - Internal - 1st Floor	No	Yes	Fixed
63	Hikvision ColourVu Bullet	Block B - Internal - 1st Floor	No	Yes	Fixed
64	Hikvision ColourVu Bullet	Block B - Internal - 1st Floor	No	Yes	Fixed
65	Hikvision ColourVu Bullet	Block B - Internal - 1st Floor	No	Yes	Fixed
66	Hikvision ColourVu Bullet	Block J - Internal - 1st Floor	No	Yes	Fixed
67	Hikvision ColourVu Bullet	Block J - Internal - 1st Floor	No	Yes	Fixed
68	Hikvision ColourVu Bullet	Block A - Internal - 1st Floor	No	Yes	Fixed
69	Hikvision ColourVu Bullet	Block A - Internal - 1st Floor	No	Yes	Fixed
70	Hikvision ColourVu Bullet	Block A - Internal - 1st Floor	No	Yes	Fixed
71	Hikvision ColourVu Bullet	Block A - Internal - 1st Floor	No	Yes	Fixed

72	Hikvision ColourVu Bullet	Block A - Internal - 1st Floor	No	Yes	Fixed
73	Hikvision ColourVu Bullet	Block A - Internal - 1st Floor	No	Yes	Fixed
74	Hikvision ColourVu Bullet	Block T - Internal - 1st Floor	No	Yes	Fixed
75	Hikvision ColourVu Bullet	Block T - Internal - 1st Floor	No	Yes	Fixed
76	Hikvision ColourVu Bullet	Block A - Internal - 1st Floor	No	Yes	Fixed
77	Hikvision ColourVu Bullet	Block A - Internal - 1st Floor	No	Yes	Fixed
78	Hikvision ColourVu Bullet	S Block - External	No	Yes	Fixed
79	Hikvision ColourVu Bullet	S Block - External	No	Yes	Fixed
80	Hikvision ColourVu Bullet	Block A - Internal - Ground Floor Library	No	Yes	Fixed
81	Hikvision ColourVu Bullet	Block A - Internal - Ground Floor Library	No	Yes	Fixed
82	Hikvision ColourVu Bullet	Room TG4 – Block T – Internal – Ground Floor	No	Yes	Fixed
83	Hikvision ColourVu Bullet	Room TG3 – Block T – Internal – Ground Floor	No	Yes	Fixed
84	Hikvision ColourVu Bullet	Room TG2 – Block T – Internal – Ground Floor	No	Yes	Fixed
85	Hikvision ColourVu Bullet	Room TG1 – Block T – Internal – Ground Floor	No	Yes	Fixed
86	Hikvision ColourVu Bullet	Block T – Internal – Ground Floor	No	Yes	Fixed
87	Hikvision ColourVu Bullet	Block T – Internal – Ground Floor	No	Yes	Fixed
88	Hikvision ColourVu Bullet	Block T – Internal – Ground Floor	No	Yes	Fixed
89	Hikvision ColourVu Bullet	Block T – Internal – Ground Floor	No	Yes	Fixed
90	Hikvision ColourVu Bullet	Block T – Internal – Ground Floor	No	Yes	Fixed
91	Hikvision ColourVu Bullet	Block T – Internal – Ground Floor	No	Yes	Fixed
92	Hikvision ColourVu Bullet	Block T – Internal – 1 <sup>st</sup> Floor	No	Yes	Fixed

### 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 both of the Data Protection 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 have 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 two years.

## **System Management**

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

The CCTV system will be administered and managed by the Operations Officer 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 Network Manager.

The system and the data collected will only be available to the Systems Manager, his/her replacement and appropriate members of the senior leadership team as determined by the Headteacher.

The CCTV system is designed to be in operation 24 hours each day, 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 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 Power Act 2000.

Where a person other than those mentioned 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 logbook including time/data of access and details of images viewed and the purpose for so doing.

## **Downloading Captured Data onto Other Media**

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

- (a) Each download media must be identified by a unique mark.
- (b) Before use, each download media must be cleaned of any previous recording.
- (c) The System Manager will register the date and time of download media insertion, including its reference.
- (d) Download media required for evidential purposes must be sealed, witnessed, and signed by the System Manager, then dated and stored in a separate secure evidence store. If a download media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.
- (e) If download media 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 release of any downloaded media 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 download media (and any images contained thereon) remains the property of the school and download media (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 media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media, this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the school to retain the downloaded media for possible use as evidence in the future. Such downloaded media 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.

### **Complaints About the Use Of CCTV**

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

### **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 School Business Manager.

### **Public Information**

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