

TANFIELD SCHOOL

Specialist College of Science & Engineering



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CCTV POLICY

CCTV Policy

Document Control

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Change History

Version	Date	Description
1.0		Initial draft, start of document
1.1		Added snippet to say Heads of Student Guidance have access
1.2	12/07/23	Review to ensure compliance with any change in policy

Related Documents/Policies

References	Title
	Data Protection Policy
	Privacy Notice for Staff
	Privacy Notice for Pupils
	Privacy Notice for Parents

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Introduction

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

The system comprises a number of fixed and dome cameras located around the school site. All cameras can be monitored by selected members of staff on school approved devices.

This policy follows guidance available from the Information Commissioner's Office (ICO) and will be subject to review annually.

The CCTV system is owned by the school and deployment is determined by the school's Senior Leadership Team.

Objectives of the CCTV scheme

- To protect the school buildings and assets, both during and after school hours
- To increase personal safety and manage behaviour on site
- To support the police in order to deter and detect crime
- To assist in identifying, apprehending, and prosecuting offenders
- To protect staff, pupils, members of the public, and private property
- To assist in managing the school

Statement of intent

The CCTV Scheme will be registered with the ICO under the terms of the Data Protection Act 2018 and the General Data Protection Regulation (UK GDPR) and will seek to comply with the requirements of the UK GDPR and the ICO CCTV Code of Practice. The school will treat the system and all information, documents, and recordings obtained and used as personal data, protected by the regulation.

Cameras will be used to monitor activities within the school, its car parks, and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school, together with its visitors.

Cameras are installed ensuring that they do not focus on private homes, gardens, and other areas of private property. All cameras as part of the system are static and therefore cannot be controlled for directed surveillance.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Recordings will never be released to the media for purposes of entertainment.

The planning and design has endeavoured to ensure that the scheme will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every incident

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taking place in the areas of coverage. As required under the Data Protection Act, the school displays notices warning of CCTV surveillance at all points of entry to the school grounds and buildings.

Operation of the system

The scheme will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in the code. The day-to-day management will be the responsibility of the Senior Leadership Team, the Business Services IT Team, and the Behaviour Team, hereby referred to as CCTV Operators.

Management of the system

The efficiency of the system will be checked on a regular basis by the Business Services IT Team. Any issues found will be recorded and resolved as soon as possible.

Access to the system

Access to the CCTV Server Room will be strictly limited in school to the SLT, Heads of Student Guidance, Year Managers, and Business Services IT Team. The system can be accessed via software by all CCTV Operators.

Visitors and other contractors wishing to enter the CCTV Server Room or access the system will be subject to particular arrangement as outlined below. CCTV Operators must satisfy themselves over the identity of any visitors and the purpose of their visit. Where any doubt exists, access will be refused. Access to the system will be monitored by a CCTV Operator and revoked should the need arise. Casual access will not be permitted.

Monitoring procedures

Camera surveillance may be maintained at all times. A monitor is installed in the CCTV Server Room (access limited to the IT Team and Facilities Team) and access is available to CCTV Operators using software.

If covert surveillance is planned, it can only be undertaken by the police or the Local Authority using the appropriate authorisation forms.

Exporting recordings

In order to maintain and preserve the integrity of any media used to export recordings from the local hard drive of the CCTV system, the following procedures must be strictly adhered to:

- The medium must be sealed, witnessed, signed by the CCTV Operator, dated, and stored in a separate, secure, evidence store. If the medium has not been copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed in the same manner.
- If the disc is archived the reference must be noted.

Commented [in1]: Access to the system - I would suggest having one person (and maybe a Deputy in their absence) responsible for receiving requests to view the CCTV in order to manage access more closely. The text in red I would consider removing altogether and suggest restricting access as SLT, Site Team and IT Support Team appears too wide to me if all are able to view/access the system

Commented [MKM2R1]: It has been discussed and we feel we have legitimate business needs for providing access to these people (SLT and Year Managers for behaviour instances, IT Team for operational issues/management).

Commented [in3]: I have highlighted my suggested additions with yellow highlighter

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Recordings may be viewed by the police for the prevention and detection of crime and authorised officers of the Local Authority. A record will be maintained of the release of recordings to the police or other authorised applicants.

Viewing of recordings by the police must be recorded in writing and in the logbook. Should a recording be required as evidence, a copy may be released to the police as described above. Recordings will only be released to the police on the clear understanding that the recording remains the property of the school, and both the recording and information contained on it are to be treated in accordance with the appropriate regulations and codes of practice. The school also retains the right to refuse permission for the police to pass to any other person the recording or any part of the information contained within. On occasions when a Court requires the release of an original recording, this will be produced from the secure evidence store, complete in its sealed bag.

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

Applications received from outside bodies (for example solicitors) to view or release recordings will be referred to the Headteacher. In these circumstances, media 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.

Breaches of the code (including breaches of security)

Any breach of the ICO CCTV Code of Practice by school staff will be initially investigated by the Headteacher, in order for them to take the appropriate disciplinary action.

Any serious breach of the ICO CCTV Code of Practice will be immediately investigated by the school's Data Protection Officer in line with the school's relevant policies and procedures.

Assessment of the scheme

Performance monitoring, including random operating checks, may be carried out at any time by the Business Services IT Team.

Privacy Impact Assessments and privacy by design

CCTV has the potential to be privacy intrusive. The school will perform a privacy impact assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate in addressing an identified need.

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Complaints

Any complaints about the school's CCTV system should be addressed to the school as per the Complaint's Procedure.

Subject Access Requests

The UK GDPR provides data subjects (individuals to whom 'personal data' relate) with a right to data held about themselves, including those obtained by CCTV. For more information about Subject Access Requests and how to make one, please view the school's Data Protection Policy and relevant Privacy Notices.

Policy Review

The Data Protection Officer is responsible for monitoring and reviewing this policy. This policy will be reviewed annually. In addition, changes to legislation, national guidance, codes of practice or information commissioner's advice may trigger interim reviews.