



Partner of Everyone Matters Schools Trust

### **Document Owner and Approval**

Mrs Zoe Simpkin is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the Trust's policy review schedule.

A current version of this document is available to all members of staff on the Staff X Drive and Trust Website

Signature: Zoe Simpkin

Date: 5<sup>th</sup> March 2024

### **Version History Log**

| <b>Version</b> | <b>Description of Change</b>  | <b>Date of Policy Release by Judicium</b> |
|----------------|---|---|
| 1              | Initial issue   | 06.05.18                                  |
| 2              | Spelling corrections  |   |
| 3              | Changes made in regard to CCTV in sensitive areas, sharing with third parties, retention and security practices around portable media devices | 19.08.21                                  |
| 4              | Formatting amendments   | 03.08.22                                  |

**CCTV Policy**

The Trust recognises that CCTV systems can be privacy intrusive.

**Objectives**

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.

The purpose of the CCTV system is to assist the Trust in reaching the following 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 and safeguarding issues;
- (c) To protect the Trust 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; and
- (g) To assist in managing the Trust.

**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 Trust. The CCTV system used by the Trust comprises of:

| <b>Camera Type &amp; Number</b> | <b>Location</b>          | <b>Sound</b> | <b>Recording Capacity</b> | <b>Swivel/Fixed</b> |
|---------------------------------|--------------------------|--------------|---------------------------|---------------------|
| 1. CCTV                         | Staff Car Park/Reception | N            | Yes on a 30 day loop      | Swivel              |

|         |                                      |   |                      |       |
|---------|--------------------------------------|---|----------------------|-------|
| 2. CCTV | Stairwell 2 in Main Building         | N | Yes on a 30 day loop | Fixed |
| 3. CCTV | Basketball Court                     | N | Yes on a 30 day loop | Fixed |
| 4.      | Staff Car Park at front of school    | N | Yes on a 30 day loop | Fixed |
| 5.      | Girls toilets in Maths               | N | Yes on a 30 day loop | Fixed |
| 6.      | Bicycle storage area                 | N | Yes on a 30 day loop | Fixed |
| 7.      | Neutral Toilets in main building x 2 | N | Yes on a 30 day loop | Fixed |
| 8.      | Reception                            | N | Yes on a 30 day loop | Fixed |
| 9.      | School Hall x 2                      | N | Yes on a 30 day loop | Fixed |
| 10.     | Library                              | N | Yes on a 30 day loop | Fixed |
| 11.     | Science double doors                 | N | Yes on a 30 day loop | Fixed |
| 12.     | Blue Canopy – main building          | N | Yes on a 30 day loop | Fixed |
| 13.     | Maths corridor double doors          | N | Yes on a 30 day loop | Fixed |
| 14.     | Stairwell 1 - main building          | N | Yes on a 30 day loop | Fixed |
| 15.     | Reception/Maths Entrance             | N | Yes on a 30 day loop | Fixed |
| 16.     | Reception door outside camera        | N | Yes on a 30 day loop | Fixed |
| 17.     | PE Corridor                          | N | Yes on a 30 day loop | Fixed |
| 18.     | Roundabout entrance                  | N | Yes on a 30 day loop | Fixed |
| 19.     | Rear of Art - outside                | N | Yes on a 30 day loop | Fixed |
| 20.     | Rear of DT – outside                 | N | Yes on a 30 day loop | Fixed |
| 21.     | Front of School                      | N | Yes on a 30 day loop | Fixed |
| 22.     | Garage/Rear of School Hall           | N | Yes on a 30 day loop | Fixed |

|     |  |   |                      |       |
|-----|--|---|----------------------|-------|
| 23. | Maths Ground Floor                         | N | Yes on a 30 day loop | Fixed |
| 24. | Maths 1 <sup>st</sup> Floor                | N | Yes on a 30 day loop | Fixed |
| 25. | Inclusion                                  | N | Yes on a 30 day loop | Fixed |
| 26. | Side of MFL Block                          | N | Yes on a 30 day loop | Fixed |
| 27. | Roundabout/Memorial Garden/Rear of Kitchen | N | Yes on a 30 day loop | Fixed |
| 28. | MFL Entrance                               | N | Yes on a 30 day loop | Fixed |
| 29. | Pride Centre                               | N | Yes on a 30 day loop | Fixed |
| 30. | Corridor 2 ADT                             | N | Yes on a 30 day loop | Fixed |
| 31. | Girls Toilets in ADT                       | N | Yes on a 30 day loop | Fixed |
| 32. | Boys Toilets in ADT                        | N | Yes on a 30 day loop | Fixed |
| 33. | Corridor 1 in ADT                          | N | Yes on a 30 day loop | Fixed |

### **Statement of Intent**

CCTV cameras are installed in such a way that they are not hidden from view. Signs are predominantly displayed where relevant so that staff, students, visitors and members of the public are made aware that they are entering an area covered by CCTV. The signs also contain contact details as well as a statement of purposes for which CCTV is used.

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. It should however be noted that the school is undergoing a schedule of works which involve updating the toilet areas in the ADT block. The school has experienced some incidents of anti social behaviour, vandalism and issues around child protection in these areas and as such the school feels the necessity for cameras to remain in those areas of school in particular from a Duty of Care and Child Protection perspective, which ultimately, we cannot compromise on. This decision and stance of the school will remain under review.

The Trust 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 endeavored 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.

CCTV images are not retained for longer than necessary, taking into account the purposes for which they are processed. Data storage is automatically overwritten by the system after a period of 30 days.

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 a compelling need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 6 months.

### **System Management**

Access to the CCTV system and data shall be password protected and will be kept in a secure area.

The CCTV system will be administered and managed by the IT Department under the direction of SLT who 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 SLT.

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, every day of the year, though the Trust 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 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 log book including time/data of access and details of images viewed and the purpose for so doing.

### **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 downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures: -

- (a) Each downloaded media must be identified by a unique mark.
- (b) Before use, each downloaded media must be cleaned of any previous recording.
- (c) The System Manager will register the date and time of downloaded media insertion, including its reference.
- (d) Downloaded 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 downloaded 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 downloaded media is archived, the reference must be noted.
- (f) If downloaded media is put onto a device, the device will be encrypted and password protected.

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 downloaded media (and any images contained thereon) remains the property of the Trust and downloaded media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The Trust 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 Trust to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until needed by the police.

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

### **Complaints About the Use of CCTV**

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

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**Requests 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 access data held about themselves, including those obtained by CCTV. Requests for such data should be made to Mrs Zoe Simpkin.

**Public Information**

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