



CCTV Policy

Recommended by:	Premises and Health & Safety Manager
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Ratified by:	Governing Body
Signed:	
Position on the Board:	Chair of Governors
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Policy Tier (Central/Hub/School):	School

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1.1 CCTV Use and Disclosure of Images – Protocol

Statement of intent

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

The system comprises multiple fixed and dome cameras located around the school site. Cameras are monitored online or from the below access point:

- The Control Room

Images and recordings are only available to selected senior staff members, ICT, and the Estates Team.

This policy follows the UK GDPR and Data Protection Act (DPA) guidelines and will be subject to regular review to include consultation as appropriate with interested parties. For information purposes the CCTV system is owned by the school.

The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 1998 and UK GDPR and will seek to comply with the requirements both of the DPA / UK GDPR and the Commissioner's Code of Practice. The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.

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 staff, pupils together with its visitors.

Staff have been instructed that static cameras are not to focus on private homes, gardens, and other areas of private property. Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained from the Principal or SLT.

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

The planning and design of the CCTV system 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 single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes / areas covered by the school CCTV.

This policy is applicable to all full-time, part-time and supply staff, pupils, contractors, volunteers, and work placement students.

Signed by:

Principal

Date:

Chair of governors

Date:

1. Objectives of the CCTV Scheme

1.1. This policy has due regard to legislation and statutory guidance, including, but not limited to, the following:

- UK GDPR Regulations
- Data Protection Act 1998
- The Management of Health and Safety at Work Regulations 1999

The objective of the scheme is to:

Protect the school buildings and their assets

To increase personal safety and reduce the fear of crime

To support the police in a bid to deter and detect crime

To Assist in identifying, apprehending, and prosecuting offenders

To protect members of the public and private property

To assist in managing the school.

2. Operation of the System

2.1. The scheme will be administered and managed by the Principal, in accordance with the principles and objectives expressed in the Code of Practice.

2.2. The day-to-day management will be the responsibility of both the Senior Leadership Team (SLT) and the Premises and Health and Safety Manager / ICT Team during the day and the Estates Team out of hours. The Reprographics Office will only be available for access to SLT, Heads of Year, Estates Team, ICT and Reprographics staff.

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

3. Control Room

3.1. The PHSM and their team will check and confirm the efficiency of the system daily and that the equipment is properly recording and that cameras are functional.

3.2. Access to the CCTV Reprographics Office will be strictly limited to the SLT and the Premises Team. Unless an immediate response to events is required, staff in the CCTV Reprographics Office must not direct cameras at an individual or a specific group of individuals.

- 3.3. Visitors and other contractors wishing to enter the Reprographics Office will be subject to arrangements as outlined below. CCTV Operators must satisfy themselves over the identity of any other visitors to the Reprographics Office and the purpose of the visit. Where any doubt exists access will be refused.
- 3.4. It is vital that operations are managed with the minimum of disruption.
- 3.5. Visitors must first obtain permission from the Premises and Health and Safety Manager, or their deputy and must be accompanied by them throughout the visit. Any visit may be immediately curtailed if prevailing operational requirements make this necessary.
- 3.6. Details of all visits and visitors will be endorsed in the Reprographics Office logbook.
- 3.7. If out of hours emergency maintenance arises, the Estates Team must be satisfied of the identity and purpose of contractors before allowing entry.
- 3.8. The Reprographics Office must always be locked when not in use.

During the working day when not staffed the room must be kept secured.
- 3.9. Other administrative functions which include production and saving of footage / recordings, maintaining occurrence and system maintenance logs are completed by the ICT and Estates team.
- 3.10. Emergency procedures will be used in appropriate cases to call the Emergency Services where required.

4. Liaison Meetings

- 4.1. Liaison meetings may be held with all bodies / persons involved in the support of the system at any time.

5. Monitoring Procedures

- 5.1. Camera surveillance is always maintained.
- 5.2. A multi-screen colour monitor is installed in the Reprographics Office to which pictures will be continuously recorded to a hard drive and kept for maximum of 7 days before being overwritten.
- 5.3. If covert surveillance is planned, it can only be undertaken by the Police or the Council using the appropriate authorisation through the Principal.

6. Video Archiving Procedures

- 6.1. Before any footage is viewed, a signed consent form must be filled out by the CCTV operative with the person requesting the footage.
- 6.2. Each recording must be identified on the hard drive (desktop file) with a unique reference / name and date.

- 6.3. The operator must register the date and time of images / recording in the CCTV Log File.
- 6.4. A recording (file) required for evidential purposes must be produced, witnessed, signed by the controller, dated, and stored with the PA to the Principal or sent securely by electronic transfer.
- 6.5. Recordings may be viewed by the police for the prevention and detection of crime. Authorised officers of the Council can also view footage. A record will be maintained of the release of recordings to the police or other authorised applicants.
- 6.6. Viewing of recordings by the police must be recorded in writing and in the logbook. Requests by the police can only be actioned under section 29 of the Data Protection Act 1998.
- 6.7. Should a recording be required as evidence, a copy may be released to the police under the procedures described in the above bullet points of section 8 of this Code.
- 6.8. 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 this code. 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 thereon.
- 6.9. The police may require the school to retain the stored images for possible use as evidence in the future. Such evidence 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 Principal. In these circumstances' images 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. A fee can be charged in such circumstances: a sum not exceeding the cost of materials in other cases.

7. Breaches of the Code

- 7.1. Any breach of the Code of Practice by school staff will be initially investigated by the Principal, for them to take the appropriate disciplinary action.
- 7.2. Any serious breach of the Code of Practice will be immediately investigated, and an independent investigation carried out to make recommendations on how to remedy the breach.

8. Assessment of the scheme and Code of Practice

- 8.1. Performance monitoring, including random operating checks, may be carried out by the Premises and Health and Safety Manager at any time.

9. Complaints

- 9.1. Any complaints about the school's CCTV system should be addressed to the Principal in writing.

10. Access by the Data subject

- 10.1. The Data Protection Act, UKGDPR 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 Principal.

11. Public Information

- 11.1. Copies of this Code of Practice will be available to the public from Reception and the Principal.

12. Summary of Key Points

- 12.1. This policy is reviewed annually by the governing board, and any changes communicated to all members of staff.
- 12.2. This Code of Practice will be reviewed annually.
- 12.3. The CCTV system is owned and operated by the school.
- 12.4. The Reprographics Office will not be manned out of school hours.
- 12.5. The Reprographics Office is not open to visitors except by prior arrangement and good reason.
- 12.6. Liaison meetings may be held with the police and other bodies.
- 12.7. Recordings will be properly indexed, stored, and deleted after appropriate use.
- 12.8. Recordings may only be viewed by authorised Council and school officers, Authorised Academy staff and the police.
- 12.9. Recordings required as evidence will be properly recorded witnessed and packaged before being released to the police.
- 12.10. Recordings will not be made available to the media for commercial or entertainment.
- 12.11. Any evidence will be disposed of securely.
- 12.12. Any breaches of this code will be investigated by the Principal. An independent investigation will be carried out for serious breaches.
- 12.13. Breaches of the code and remedies will be reported to the Principal.
- 12.14. Staff will be required to familiarise themselves with this policy as part of their induction programme. Staff will be informed of the arrangements that have been made in

connection with the provision of first aid, including the location of equipment, facilities, and personnel.

13. Policy Review

13.1. This Policy will be reviewed annually and is due for next review in March 2023

Appendix 1.1

CCTV – USE AND DISCLOSURE OF IMAGES

PROTOCOL

Legitimate public concerns exist over the use of CCTV and many of the specific guidelines are designed to satisfy the community that the use of cameras is subject to adequate supervision and scrutiny. It is of fundamental importance that public confidence is maintained by fully respecting individual privacy.

All employees that are authorised to view the CCTV images within Gospel Oak School need to read this protocol alongside the CCTV Policy and confirm that they understand and agree to abide by the policy and protocol.

- 1 CCTV images may only be viewed by authorised employees.
- 2 All authorised employees viewing the CCTV images will always act with utmost probity.
- 3 All images viewed by authorised employees must be treated as confidential.
- 4 All authorised employees are to ensure that whilst viewing CCTV images, unauthorised employees or visitors cannot view the images.
- 5 All authorised employees are responsible to ensure that CCTV images are not left on any screen without an authorised employee being left in charge. An authorised employee should log out of the programme when leaving the screen
- 6 Every viewing of the images will accord with the purposes and key objectives of the CCTV system and shall comply with the CCTV Policy.
- 7 All authorised employees viewing CCTV images should be aware of exercising prejudices, which may lead to complaints of the system being used for purposes other than those for which it is intended. The viewers may be required to justify their interest in any particular individual, group of individuals or property at any time.
- 8 All authorised employees viewing CCTV images are responsible for their every viewing of the images, which must be justifiable.
- 9 Any breach of the CCTV Policy or CCTV Protocol will be dealt with in accordance with existing discipline regulations. Individuals must recognise that any such breach may amount to gross misconduct, which could lead to dismissal.
- 10 Any breach of the Data Protection Act 1998 will be dealt with in accordance with that legislation. All authorised employees viewing CCTV images must be aware of their liability under this act.

I understand and agree to abide by the CCTV Policy and the CCTV Protocol.

NAME	JOB TITLE	SIGNATURE	DATE
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