



CCTV Policy

Ermysted's Grammar School

The Governing Body of Ermysted's Grammar School (the 'School') ratified this policy on 25 June 2020.

1. Introduction

- 1.1. The purpose of this Policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at Ermysted's Grammar School.
- 1.2. The system comprises a number of fixed cameras:
 - external cameras mounted on the walls of buildings around the site and targeted at entry and exit points, driveways and paths as well as communal areas; and
 - internal cameras located at key points within the school buildings, directed at main corridors and key entry and exit points.
- 1.3. The system can only be accessed through desktop computers in the offices of the IT Manager and the Site Manager.
- 1.4. The cameras do not record audio and live images from the cameras are not routinely monitored. Recorded images may be viewed to assist with the objectives outlined below.
- 1.5. Access to the images will be limited to the Headmaster or to authorised senior members of staff acting on his behalf.
- 1.6. Recorded data will not be retained for longer than necessary. All images will be routinely deleted after one week, unless required for on-going investigations or prosecutions.
- 1.7. This Policy follows Data Protection Act guidelines and complies with the Information Commissioner's CCTV code of practice.
- 1.8. The School Policy will be subject to regular review to include consultation as appropriate with interested parties.

2. Objectives of the CCTV system

- 2.1. To protect pupils, staff and visitors.
- 2.2. To increase personal safety and reduce the fear of crime.
- 2.3. To protect the school buildings and assets.
- 2.4. To support the police in preventing and detecting crime.
- 2.5. To assist in identifying, apprehending and prosecuting offenders.
- 2.6. To assist in the safeguarding of children in and around the site.

3. Statement of Intent

- 3.1. The CCTV system will seek to comply with the requirements both of the Data Protection Act¹ and the Commissioner's Code of Practice².
- 3.2. The school will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.
- 3.3. Cameras will be used to monitor activities within the school to identify criminal activity and to assist with attendance monitoring. It will be used for the purpose of securing the safety and wellbeing of the pupils, staff and school together with its visitors.
 - 3.3.1. The system has been designed to deny observation on adjacent private homes, gardens and other areas of private property.

¹ <http://www.legislation.gov.uk/ukpga/1998/29/contents>

² <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

- 3.3.2. 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.
- 3.4. The planning and design has 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.
- 3.5. Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible on the site.

4. System Management

- 4.1. The system will be administered and managed by the Headmaster who will act as the Data Controller, in accordance with the principles and objectives expressed in the policy.
- 4.2. The day-to-day management will be the responsibility of the IT Manager who will act as the System Manager.
- 4.3. The system and the data collected will only be available to the Headmaster, a specifically authorised senior member of staff and the System Manager.
- 4.4. The CCTV system will be in operation continuously.
- 4.5. The System Manager will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.
- 4.6. 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.
- 4.7. The System Manager must satisfy themselves of the identity of any person wishing to view images or access the system and the legitimacy of the request. Where any doubt exists access will be refused.
- 4.8. Details of all visits and visitors will be recorded in the system log book including time/data of access and details of images viewed.
- 4.9. Any visit may be immediately curtailed if prevailing operational requirements make this necessary.

5. Liaison

- 5.1. Liaison meetings may be held with all bodies involved in the support of the system.

6. Download media procedures

- 6.1. 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: -
 - 6.1.1. Each download media must be identified by a unique mark.
 - 6.1.2. Before use, each download media must be cleaned of any previous recording.
 - 6.1.3. The System Manager will register the date and time of download media insertion, including its reference.
 - 6.1.4. 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.
 - 6.1.5. If download media is archived the reference must be noted.
- 6.2. Images may be viewed by the police for the prevention and detection of crime.
- 6.3. A record will be maintained of the release of any download media to the police or other authorised applicants.
- 6.4. Viewing of images by the police must be recorded in writing.

- 6.5. 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.
 - 6.6. 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.
 - 6.7. Applications received from outside bodies (e.g. parents, solicitors, etc.) to view or release images will be referred to the Headmaster.
- 7. Assessment of the system and code of practice**
- 7.1. Performance monitoring, including random operating checks, may be carried out by the Headmaster or the School Business Leader.
- 8. Complaints**
- 8.1. Any complaints in relation to the school's CCTV system should be addressed to the Headmaster.
- 9. Access by the data subject**
- 9.1. 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.
 - 9.2. All requests should be made in writing to the Headmaster. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location. The school will respond to requests within 40 calendar days of receiving the written request and fee. A fee of £10 will be charged per request.
 - 9.3. The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.
- 10. Public Information**
- 10.1. Copies of this policy will be available to the public from the school website or the school office.
- 11. Summary of key points**
- 11.1. This Policy will be reviewed on a regular basis.
 - 11.2. The CCTV system is owned and operated by the School.
 - 11.3. The CCTV system and images are not available to visitors except under circumstances as outlined in this policy.
 - 11.4. Liaison meetings may be held with the police and other bodies if required.
 - 11.5. Downloaded media will be used properly indexed, stored and destroyed after appropriate use, in accordance with the Data Protection Act.
 - 11.6. Images may only be viewed by authorised School Staff and the police.
 - 11.7. Downloaded media required as evidence will be properly recorded, witnessed and packaged before copies are released to the police.
 - 11.8. Downloaded media will not be made available to the media for commercial or entertainment purposes.
 - 11.9. The Headmaster or senior member of staff acting on his behalf will conduct the initial investigation into any breaches of this policy.