



# Policy for the Use of Closed Circuit Television (CCTV)

(Whole School Including EYFS)

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<b>Responsible:</b>	Director of Finance and Operations		

## **1. Introduction**

- a. Under the Protection of Freedoms Act 2012, the Data Protection Act governs the processing of personal data captured by Closed Circuit Television (CCTV) systems (including images identifying individuals) and the Information Commissioner's Office (ICO) has issued a code of practice on compliance with legal obligations under that Act. The use of CCTV by schools is covered by the Act, regardless of the number of cameras or how sophisticated the equipment is.
- b. This policy should be read with reference to the Data Protection Act 1998, the Protection of Freedoms Act 2012 and the CCTV code of practice 2008 from the ICO.
- c. The purpose of this Policy is to explain the management, operation and use of the closed circuit television (CCTV) system at Orley Farm School. The system comprises a number of fixed cameras located around the school site. Live images from the system are on permanent view at the School Reception, the Maintenance Manager's Office, the School Caretakers Flat and at the home of the Maintenance Manager. Recorded and live images from the cameras may be viewed by accessing the School's IT network. Access to the images is password protected and therefore restricted to a limited number of Authorised Staff.

## **2. Objectives**

- a. Orley Farm School uses CCTV equipment to provide a safer, more secure environment for pupils and staff and to prevent bullying, vandalism and theft. It is used:
  - I. To protect the School buildings and their contents;
  - II. To increase personal safety and reduce the fear of crime;
  - III. To deter criminals from targeting the School;
  - IV. To support the Police in a bid to deter and detect crime;
  - V. To assist in identifying, apprehending and prosecuting offenders and
  - VI. To protect members of the public and private property.
- b. Orley Farm School does not use the CCTV system for covert monitoring.

### **3. Statement of Intent**

- a. Cameras are located in those areas where the school has identified a need and where other solutions are ineffective. Orley Farm School's CCTV system is used solely for the purposes(s) identified above and is not used to routinely monitor staff conduct. Cameras will only be used in exceptional circumstances in areas where the subject has a heightened expectation of privacy e.g. changing rooms or toilets. In these areas, the school will use increased signage in order that those under surveillance are fully aware of its use.
- b. 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.
- c. Staff that have access to the system have been instructed that cameras are not to focus on private homes, gardens and other areas of private property. The cameras are mounted such that no images can be obtained through windows of changing rooms or private staff accommodation. There are cameras within buildings.
- d. Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals (Directed Surveillance), without written authorisation obtained from the Director of Finance and Operations or Headmaster, as set out in the Regulation of Investigatory Power Act 2000.
- e. Materials or knowledge secured because of CCTV will not be used for any commercial purpose. Images will only be released for use in the investigation of a specific crime and with the written authority of the Police. Images will never be released for purposes of entertainment.
- f. The planning and design has endeavoured to ensure that the CCTV installation will give maximum effectiveness and efficiency, but it is impossible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.
- g. Warning signs have been placed at key points around the school site.

### **4. Operation of the System**

- a. The CCTV system will be operated 24 hours each day, every day of the year.
- b. The Scheme will be administered and managed by the Director of Finance and Operations, in accordance with the principles and objectives expressed in the Code and this Policy. The day-to-day management of the system will be the responsibility of the Facilities Manager with technical support from the IT Manager.
- c. The IT Department is responsible for regularly checking and confirming the efficiency of the system and in particular that the equipment is properly recording and that cameras are working.

- d. Access to the images is to be strictly controlled by a password system managed by the Office Manager with the support of the IT Manager. Routine viewing of **recorded** images is to be limited to:
  - I. Director of Finance and Operations
  - II. Headmaster
  - III. Deputy Head
  - IV. Head Caretaker
  - V. Facilities Manager
  - VI. IT Technician or in his absence a nominated deputy
  - VII. Maintenance Manager or in his absence a nominated deputy
- e. When circumstances require, the Headmaster or Director of Finance and Operations have authority to allow other members of staff to view recorded images. Staff other than those listed above who view the recorded images are to be recorded in the CCTV Register held by the IT Department. Requests from the Police may only be actioned under Section 29 of the Data Protection Act 1998. The names of the Police Officers who view recorded images will also be recorded in the Register.

## **5. Image Control**

- a. Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific times and dates to be identified. Access to live images is restricted to the CCTV operator unless the monitor displays a scene which is in plain sight from the monitored location. Recorded images can only be viewed in a controlled area by approved staff. The recorded images are viewed only when there is suspected criminal activity and not for routine monitoring of pupils, staff or visitors unless the camera(s) are installed to monitor the safe movement of persons through a designated area e.g. corridors (these areas will be identifiable by clear signs).
- b. The school reserves the right to use images captured on CCTV where there is activity that the school cannot be expected to ignore such as criminal activity, potential gross misconduct, or behaviour which puts others at risk.
- c. Images retained for evidential purposes will be retained in a locked cabinet in the Bursary and accessible by authorised persons only. Where images are retained, the system administrator will ensure the reason for its retention is recorded; where it is kept; any use made of the images and when it is destroyed.
- d. The IT Manager is to ensure that images are held for a maximum of 28 days and are then overwritten.
- e. Cameras will be pointed and focused on fixed points, agreed in advance by the Director of Finance and Operations and Headmaster. Only the Maintenance Manager with written authority from the Director of Finance and Operations, recorded in the CCTV Register, shall be allowed to modify camera positions in response to a particular event or circumstances that is deemed to require surveillance.
- f. Applications received from outside bodies (e.g. solicitors) to view or release images will be referred to the Director of Finance and Operations or Headmaster. 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 of £10 can be charged in such circumstances or a sum not exceeding the cost of materials.

- g. All requests for access or for disclosure are to be recorded. If access or disclosure is denied, the reason is to be documented.

## **6. Breaches of the Policy (including breaches of security)**

- a. Any breach of the Policy by School staff will be investigated under Orley Farm School's disciplinary procedure.

## **7. Complaints**

- a. Any complaints about the School's CCTV system should be addressed in writing (not by e mail) to the Director of Finance and Operations who will instigate Orley Farm School's complaints procedure.

## **8. Access by the Data Subject**

- a. Individuals whose images are recorded have a right to view images of themselves and, unless they agree otherwise, to be provided with a copy of the images. If the school receives a request under the Data Protection Act, it will comply with requests within 40 calendar days of receiving the request. The school will charge a fee for the provision of a copy of the images of £10 or the cost of materials whichever is the greater. If the school receives a request under the Freedom of Information Act, it will comply with requests within 20 working days of receiving the request. (As a rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and its disclosure is unlikely as a Freedom of Information request.) Those requesting access must provide enough detail to allow the School to identify that they are the subject of the images, and for the School to locate the images on the system. Requests for access should be addressed, in writing, to the Information Systems Officer.
- b. Refusal to disclose images may be appropriate where its release is:
  - I. Likely to cause substantial and unwarranted damage to that individual.
  - II. To prevent automated decisions from being taken in relation to that individual.