Willingdon
COMMUNITY SCHOOL

CCTV Policy & Code of Practice

Date last adopted by the Governing Body: Oct 2020

To be reviewed: Oct 2021

SLT Staff Responsible: Andy Webb

Link Governor: Brett Levett

Willingdon Community School
School CCTV Policy and Code of Practice

1 Introduction

1.1 Willingdon Community School uses closed circuit television (CCTV). The use of CCTV and images produced are for the following purposes;

- Ensuring the wellbeing of individuals on the school site
- Protecting the school buildings and assets
- Protecting the personal property of visitors, staff and students to the school
- Supporting the police in their duties, including identifying, apprehending and prosecuting offenders
- Prevention or detection of crime
- Safeguarding of staff, pupils and visitors

1.2 The system comprises of a number of fixed and dome cameras.

1.3 The system does not have sound recording capability.

1.4 The CCTV system is owned and operated by the Willingdon Community School, the deployment of which is determined by the School's Leadership Team (SLT).

1.5 The CCTV is monitored centrally from the ICT office, Site office, SLT workstations/laptops and Reception. Access to the images is controlled and approved by a member of Senior Leadership Team (SLT).

1.6 The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and members of the school community.

1.7 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998 and GDPR. The use of CCTV, and the associated images are covered by the Data Protection Act 2018. This policy outlines the school's use of CCTV and how it complies with the Act and GDPR.

1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded

images. Through this policy, all operators are made aware of their responsibilities in following the CCTV Code of Practice. The school's 'Data Controller' (Head Teacher) will ensure that all employees are aware of the restrictions in relation to access to, and disclosure of, recorded images by publication of this policy.

2 Statement of Intent

2.1 The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:
https://ico.org.uk/media/1542/cctv-code-of-practice.pdf

2.2 CCTV warning signs are clearly and prominently placed at the main reception entrance to the school, including DT, Drama exit, ~~Community Suite~~ Student Support entrance, DT3, IT Corridor, EN6 external door, Sports Hall, front and rear carpark, outside Staffroom\LRC area. Signs will contain details of the purpose for using CCTV (see appendix B). In areas where CCTV is used, the school will ensure that there are prominent signs placed within the controlled area.

2.3 The original planning, design and installation of CCTV equipment endeavoured to ensure that the scheme will deliver 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 Siting the Cameras

3.1 Cameras are sited so that they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act and GDPR.

3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which includes outdoor/indoor areas. The school will apply privacy masks where required.

3.3 Excluding the ICT/Business and Music suites, CCTV will not be used in classrooms but in limited areas within the school building that have been identified by Senior Leadership team as areas needing monitoring.

3.4 Members of staff will have access to details of where CCTV cameras are situated with the exception of cameras placed for the purpose of covert monitoring where we believe illegal activity/ties to be occurring.

4 Covert Monitoring

4.1 It is not the school's policy to conduct 'Covert Monitoring' unless there are 'exceptional reasons' for doing so.

4.2 The school may, in exceptional circumstances, determine a sound reason to set up covert monitoring.

For example:

i) Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct.

ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

4.3 In these circumstances authorisation must be obtained from a member of the Senior Leadership Team (SLT) and/or DoSPs and the school's 'Data Controller' advised before any commencement of such covert monitoring.

4.4 Covert monitoring must cease following completion of an investigation.

4.5 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles, changing areas etc.

5 Storage and Retention of CCTV images

5.1 Recorded data will be retained for 24 days. Extracts of recordings will be retained for no longer than is necessary. While retained, the integrity and security of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

5.2 All retained data will be stored securely at all times and permanently deleted as appropriate/required.

6 Access to CCTV images

6.1 Access to recorded images will be restricted to staff authorised to view them by the Senior Leadership Team (SLT) and/or DoSPs and Data Controller. Access to recordings will not be made more widely available.

7 Subject Access Requests (SAR)

7.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act and GDPR.

7.2 All requests should be made in writing to the Head Teacher. 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.

7.3 The school will respond to requests within 40 calendar days of receiving the written request and any fee. This is as per the ICO CCTV Code of Practice.

7.4 A fee of £10 may be charged per request. This is as per the ICO CCTV Code of Practice.

7.5 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.

8 Access to and Disclosure of Images to Third Parties

8.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).

8.2 Requests for images/data should be made in writing to the Head Teacher.

8.3 The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

9 Complaints

9.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Head Teacher in the first instance.

Further Information

Further information on CCTV and its use is available from the following: CCTV Code of Practice Revised Edition 2017 (published by the Information Commissioners Office) Version 1.2
www.ico.org.uk
Regulation of Investigatory Powers Act (RIPA) 2000
Data Protection Act 2018
GDPR (wef 25 May 2018)

Appendix A – Checklist

This CCTV system and the images produced by it are controlled by the Business Manager who is responsible for how the system is used under direction from the schools 'Data Controller'. The school notifies the Information Commissioner about the CCTV system, including any modifications of use and/or its purpose (which is a legal requirement of the current Data Protection Act 1998).

Willingdon Community School has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of the school's community. It will not be used for other purposes. The school will conduct regular reviews of our use of CCTV.

	Checked (date if appropriate)	**By** (SLT member)	**Date of next review**
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Yes	A.Webb	Oct 2020
There is a named individual who is responsible for the operation of the system.	Yes	E.Beer	
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	Yes	A.Webb	
Staff and members of the school community will be consulted about any proposal to install / amend CCTV equipment or its use as appropriate.	Yes	E.Beer/F.Rodgers A.Walters / A.Webb	
Cameras have been sited so that they provide clear images.	Yes	A.Webb	
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Yes	A.Webb	
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	Yes	A.Webb	
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes	A.Webb	

The 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.	Yes	E.Beer /F.Rodgers A.Walters / A.Webb	
Except for law enforcement bodies, images will not be provided to third parties.	Yes	E.Beer	
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the data controller knows to seek advice from the Information Commissioner as soon as such a request is made.	Yes.	E.Beer	
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes. Daily	A.Webb/ICT	

Appendix B – CCTV Signage

It is a requirement of the Data Protection Act 2018 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

This area is covered by CCTV surveillance and pictures are recorded
The purpose of using CCTV
The Name of the school
The telephone or contact address for any enquiries

Example sign.