

BUXTON COMMUNITY SCHOOL



CCTV Guidance & Policy 2019 -20

Last Reviewed	Resource Committee 24.1.2019
Reviewed by	Jayne McMillan Head of School Business and Resources
Next review date	July 2020

1. Introduction

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

The system comprises a number of fixed cameras located around the school site.

The use of CCTV can be affected by a number of Acts including the Human Rights Act, the Regulation of Investigatory Powers Act (RIPA) and the General Data Protection Regulation. The school retains the right to be the data controller for all footage recorded through the use of its CCTV cameras.

The CCTV system is owned by the school and there is a designated number of staff with access, limited to SLT, Pastoral Managers and the Facilities Manager.

The IT Systems Manager has access for the purposes of administering the system, maintenance and backup.

Images are not actively monitored but may be reviewed for any of the objectives laid out in section 2 of this document. Operators are aware that they are only able to use the equipment in order to achieve the objectives for which it has been installed.

2. Objectives of the CCTV scheme

- To protect the school buildings and their assets during and outside school hours
- To increase personal safety for staff, pupils and visitors.
- Reduce the fear of crime and reassure staff, pupils and visitors.
- To support the police in a bid to deter and detect crime and anti-social behavior.
- To assist in identifying, apprehending and prosecuting offenders.
- To protect members of the public and private property.
- To assist in managing the school by ensuring school rules are respected.

3. Statement of intent

CCTV 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 well being of the school, 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 using the school's forms for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.

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

The planning and design 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 to areas covered by the school CCTV.

4. Operation of the system

The scheme will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in the code. The day-to-day management will be the responsibility of both the Senior Leadership Team (SLT) and the Facilities Manager during the day and the Site Team out of hours and at weekends.

The CCTV system will be operated 24 hours each day, every day of the year, unless mitigating factors apply.

The CCTV Scheme will be registered with the Information Commissioner and will seek to comply with the requirements of the 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.

5. Liaison

Liaison meetings may be held with all bodies involved in the support of the system and external agencies whereby there is a legitimate need to share the images recorded from the system and prior approval has been sought by the headteacher or safeguarding lead.

6. Backup and additional media

In order to maintain and preserve the integrity of the media used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

- Backup media must be uniquely identified.
- The controller must register the date and time of media.
- A recording required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence store.
- If the recording is archived the reference must be noted and retention periods will apply.

Recordings may be viewed by the police and/or authorised officers of the Council for the prevention and detection of crime upon receipt of appropriate authorization and consent forms. A record will be maintained of the release of recordings to the police or other authorised applicants and will only be released to the police on the clear understanding that the recording remains the property of the school. 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.

7. Breaches of the code (including breaches of security)

Any breach of the Code of Practice by school staff will be initially investigated by the Headteacher, in order for them to take the appropriate disciplinary action.

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. If necessary, reports may be made to Derbyshire County Council's audit department and/or the Information Commissioner's Office (ICO).

8. Assessment of the scheme and code of practice

Performance monitoring, including random operating checks, may be carried out by the Facilities Manager or IT Systems Manager.

9. Complaints

Any complaints about the school's CCTV system should be addressed to the Headteacher. Complaints will be investigated in accordance with Section 7 of this Code.

10. Access to Recordings / Images

The individuals to whom 'personal data' relates have a right to access data held about themselves, including those obtained by CCTV. Requests for data subject access should be made on a SAR form available from the school office.

Applications received from outside bodies (for example solicitors) to view or release recordings will be referred to the Headteacher.

In these circumstances recordings will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, as a verified subject access request or in response to a court order.

Copies of this Code of Practice will be available to the public from the School Office.

Summary of Key Points

- This Code of Practice will be reviewed regularly.
- The CCTV system is owned and operated by the school.
- Liaison meetings may be held with the police and other bodies.
- Recordings will be properly indexed, stored and destroyed after appropriate use.
- Students and parents will be provided with images, where appropriate following a SAR request.
- Recordings may only be viewed by authorised Council and school staff and the police.
- Recordings required as evidence will be properly recorded witnessed and packaged before copies are released to the police.
- Recordings will not be made available to the media for commercial or entertainment.
- Digital Storage media will be disposed of securely following the retention periods specified in the schools retention and records management policy.
- Any breaches of this code will be reported to and investigated by the Headteacher.
- An independent investigation will be carried out for serious breaches.