

CCTV Policy

This policy has been written for...	All staff and students at West Heath School
Copies of this policy may be obtained from...	<ul style="list-style-type: none"> • The School web site - http://www.westheathschool.com • It is available as a hard copy on request from the school office
This policy links with the following policies	This policy should be read in conjunction with the Data Protection Policy, Transport Policy and Outings, Trips, Visits Policy.
Participants and consultees in the formulation of this policy were...	The Principal, Senior Management Team, Student Services Committee and the Trustees of the School.
Edition, Review frequency and dates	This is edition 5, released November 2023 It is due for review November 2024
Relevant statutory guidance, circulars, legislation & other sources of information are...	Data Protection Act 2018 Information Commissioner's Office – CCTV Code of Practice Home Office – Surveillance Camera Code of Practice
The Lead Member of staff is	Deputy Principal/ Network Manager
Definitions and key terms used in this policy...	ICO – Information Commissioner's Office
The Rationale and Purpose of this policy	To regulate the management and use of the closed-circuit television (CCTV) system at the School.
Appendices	This policy does not have any appendices.
Copying	No school policy is ever written in isolation. Acknowledgement of sources of advice and significant influence in the development and recording of policies at the West Heath School are noted on the front page. We request that any schools or organisations incorporating large sections of this policy without alteration should make similar appropriate acknowledgement.

Introduction

- 1.1 The purpose of this policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system at West Heath School, hereafter referred to as 'the school'.
- 1.2 The system comprises fixed and rotating cameras located around the school site. Networked camera feeds are available to selected Maintenance, Boarding, IT & senior staff on the CCTV Network.
- 1.3 This policy follows Data Protection Act guidelines and the CCTV Small User Checklist compliance advice will be completed yearly by the school Network Manager.

The Aims & Objectives of this policy..

- 2.1 To protect the school buildings and their assets.
- 2.2 To increase personal safety and reduce the fear of crime.
- 2.3 To support the police in a bid to deter and detect crime.
- 2.4 To assist in identifying, apprehending and prosecuting offenders.
- 2.5 To protect students, members of staff and visitors.
- 2.6 To assist in managing the school.

Commented [bc1]: Phil Holland has commented - It is worth noting that CCTV is not a control measure in reducing the risk of a hazard. Yes, its presence can act as a deterrent and it is great for establishing facts and assist in identifying offenders but it is unlikely to reduce risk or increase personal safety in the transportation of students in cars for example.

Statement of Intent

- 3.1 The CCTV Scheme is registered with the ICO under the terms of the Data Protection Act 2018.
- 3.2 The school will treat the system and all information, documents and recordings obtained and used, as data which are protected by the Act.
- 3.3 Cameras will be used to monitor activities within the school and its grounds to identify criminal activity occurring, anticipated, or perceived, and for the purpose of securing the safety and well being of the school, together with its visitors and contractors.
- 3.4 Materials or knowledge secured, as a result of CCTV, will not be used for any commercial purpose. Recordings will only be made available to law enforcement agencies involved in the prevention and detection of crime, and no other third parties.
- 3.5 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.

- 3.6 Warning signs, as required by the Code of Practice of the ICO have been placed at all access routes to areas covered by the school CCTV.
- 3.7 School vehicles containing audio and video recording facilities are required to have a notice to alert staff and students that whilst in the vehicle they are being audio recorded. The recording will be kept for 2 hours at which point it will be deleted unless an accident has taken place and an investigation is underway. In this instance CCTV footage will be retained until the investigation has been completed. Anyone wishing to access footage must request this by consulting a member of SMT and completing a CCTV request form. This must be passed to the Network Manager, Head of Safeguarding and Care or Principal for approval.

Procedures & Practices

4. Operation of the system

- 4.1 The system will be administered and managed by the Network Manager in accordance with the ICO CCTV Code of Practice.
- 4.2 The day to day management will be the responsibility of the Senior Management Team, Network Manager and the Head of Residential. Access to the CCTV facilities will be strictly limited to authorised staff only.
- 4.3 The CCTV system will be operated 24 hours each day, every day of the year.
- 4.4 The IT Department will check the operation of all cameras daily and report any faults to the Network Manager. The Network Manager will check the functionality of the system on a weekly basis.

5. Monitoring procedures

- 5.1 Main School camera surveillance may be monitored should an incident occur that requires urgent attention. An example would be a student missing from class.
- 5.2 CCTV will be continuously recorded and will delete automatically.
- 5.3 Video camera evidence of any incident, if available, will be used in investigating incidents of unacceptable behaviour, recognising that CCTV cameras are not, and will not, be used for the monitoring of teaching and learning. They are to deter poor behaviour and for the support and protection of staff, students, visitors, contractors, buildings and assets.

- 5.4 The decision not to have a CCTV camera installed in a classroom is at the discretion of the teacher responsible for that classroom. Where the teacher responsible for a classroom base would like the CCTV provision switched off, the camera will be disconnected.
- 5.5 Only members of the Senior Management Team have the authority to request a transfer of CCTV coverage to removable storage media for evidential purposes. This must be sealed, witnessed, signed, dated and stored in a separate, secure store (i.e the school safe).
- 5.6 The CCTV may be viewed by law enforcement agencies for the prevention and detection of crime. A record will be maintained of the release of any CCTV recordings to the police or other law enforcement agencies.
- 5.7 The police may require the school to retain the stored data for possible use as evidence in the future. Such data will be properly indexed and securely stored until it is needed by the police.
- 5.8 No other applications received from third parties to view or release CCTV recordings will be permitted.
- 5.9 Photographic evidence may be kept and used by the school in identifying, apprehending and prosecuting offenders.
- 5.10 CCTV cameras within the main body of the school contain no audio function. Audio is only available in school vehicles.

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

- 6.1 Any breach of this Policy by school staff will be initially investigated by the Principal, in order for him or her to take the appropriate disciplinary action.

7. Assessment of the scheme and code of practice

- 7.1 Performance monitoring, including random operating checks, may be carried out by the Principal and the Network Manager.

8. Complaints

- 8.1 Any complaints about the school's CCTV system should follow the school's complaints procedure.

9. Access by the data subject

- 9.1 The Data Protection act provides data subjects (individuals to whom “personal data” relates) with a right to data held about themselves, including those obtained by CCTV.
- 9.2 Requests for data subject access should be made in writing to the Principal.
- 9.3 Any Staff wishing to view CCTV footage must gain approval from the Senior Management Team electronically (E-Mail) and complete the CCTV request form. The electronic authorisation document must be attached to the CCTV request form. Footage can then be viewed providing a second member of staff is present to validate any information.
- 9.4 Residential staff regularly consult with Residential students regarding appropriate use of CCTV. With consideration to privacy issues, The Residential CCTV System covers all communal areas.
- The CCTV does not intrude unreasonably on our students’ privacy because:
- The CCTV in residential is non-audio.
 - The CCTV in residential communal areas is a NON MONITORED system, meaning no live footage is ever available.
 - The recordings can only be assessed by the Care Management Team, Senior Management Team and police but, only if the incident is deemed important and serious enough for the CCTV to be reviewed.
 - Any request to review the CCTV in residential is also recorded. There is a requirement of a minimum of 2 authorised members of staff to be present whilst reviewing recorded footage from the residential CCTV system.
 - The CCTV equipment is in a locked room in school where all entries are recorded. Only Authorised staff have access to this room.
- 9.5 The only Residential staff authorised to view CCTV footage are Head of Safeguarding and Care or Residential Manager. Approval must be obtained as per 9.3 and a second person from SMT to validate any information.
- 9.6 In instances where investigations are necessary, HR may access and view relevant footage and retain and store them within the HR department, whilst the investigation is underway and until it is concluded. Normal data protection procedures will be followed in these instances.

Commented [mw2]: We need a document outlining what is deemed Important or serious.

Persons with particular responsibilities

Principal
Senior Management Team
Head of Care & Safeguarding
Residential Manager
Network Manager

Other Participants & Stakeholders

Students
Staff

Monitoring & Evaluation

SMT
Student Services Committee
Trustees