



## **CCTV Policy 2022**

### **Background and rationale:**

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) at Hope Tree School. This policy follows the guidelines published by the Home Office and the Information Commissioner's Office (ICO) 2008 on the use of CCTV in public places.

The school recognises that CCTV systems can be intrusive. For this reason, the school has carried out a data protection impact assessment which found that a CCTV system is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the data protection impact assessment has informed the school's use of CCTV and the contents of this policy.

### **Aims of the policy:**

The purpose of this policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at Hope Tree School.

### **Objectives of the CCTV System:**

The purpose of the CCTV system is to assist the school in reaching these objectives:

- To protect students, staff and visitors against harm to their person and/or property
- To increase a sense of personal safety and reduce the fear of crime
- To protect the school buildings and assets
- To support the police in preventing and detecting crime
- To assist in identifying, apprehending and prosecuting offenders
- To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence
- To assist in managing the school

### **Statement of Intent:**

- Notification has been submitted to the Information Commissioner and the next renewal date has been recorded.
- The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.
- The school will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under

the Act.

- The system has been designed so far as possible to deny observation on adjacent private homes, gardens and other areas of private property.
- 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.
- 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.
- Warning signs, as required by the Code of Practice of the Information Commissioner, will be clearly visible on the site and make clear who is responsible for the equipment.
- Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.
- 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.
- In the absence of a compelling need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 7 days when it is automatically overwritten.

### **The system:**

The CCTV system used by the school comprises of:

<b>Camera number</b>	<b>Camera type</b>	<b>Location</b>	<b>Sound Y/N</b>	<b>Recording capacity Y/N</b>	<b>Swivel/ Fixed S/F</b>
1	Analogue	Front Entrance facing the door	N	Y	F
2	Analogue	Rear Garden area facing the gate	N	Y	F
3	Analogue	Rear Garden area facing the gate	N	Y	F

### **System Management:**

- Access to the CCTV system and data shall be password protected.
- The CCTV system will be administered and managed by Rebecca Sands, Head of Learning, who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Head of Learning the system will be managed by Fiona D'Arcy, Head of Pastoral Care.
- The system and the data collected will only be available to relevant personnel as determined by the Head of Learning.
- The CCTV system is designed to be in operation 24 hours per day, every day of the year, though the school does not guarantee that it will be working during these hours.
- The Head of Learning will check and confirm the efficiency of the system

regularly and in particular that the equipment is properly recording and that cameras are functional.

- Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by providing clear, usable images.
- 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.
- Where a person, other than those mentioned above, requests access to the CCTV data or system, the Head of Learning must satisfy themselves of the identity and legitimacy of purpose of any person making such request. Where any doubt exists access will be refused.
- Details of all visits and visitors will be recorded in a system log book including time/date of access and details of images viewed and the purpose for so doing.

### **Downloading Captured Data onto Other Media:**

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures:

Each downloaded media must be identified by a unique mark.

- Before use, each download media must be cleaned of any previous recording.
- The Head of Learning will register the date and time of download media insertion, including its reference.
- Download media required for evidential purposes must be sealed, witnessed and signed by the Head of Learning, 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 Head of Learning, then dated and returned to the evidence store.
- If download media is archived the reference must be noted.

Images may be viewed by the police for the prevention and detection of crime and by the Head of Learning or designated replacement. If however one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any download media to the police or other authorised applicants.

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 downloaded media (and any images contained thereon) remains the property of the school, and downloaded 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 downloaded media this will be produced from the secure evidence store, complete in its sealed bag.

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.

Applications received from outside bodies (e.g. solicitors or parents) to view or release images will be referred to the school's Data Protection Officer and a decision made by the Head of Learning in consultation with the school's Data Protection Officer.

### **Complaints about the Use of CCTV:**

- Any safeguarding concerns regarding the access and use of the schools CCTV system should be recorded and reported to the DSL or a Deputy DSL.
- Any complaints about the school's CCTV system should be addressed to the Head of Learning.
- Complaints will be investigated in accordance with this policy.

### **Request for Access by the Data Subject:**

The Data Protection Act provides Data Subjects – those whose image has been captured by the CCTV system and can be identified - with a right to data held about themselves, including those obtained by CCTV. Requests for such data should be made to the Head of Learning.

### **Public Information:**

Copies of this policy will be available to the public on request to the school.

### **This policy will be monitored through:**

- Annual reports to the school's advisory board.

### **Related policies and documents:**

- Safeguarding and Child Protection Policy

- Data Protection Policy
- Health & Safety Policy

### **Related links**

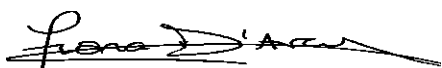
<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

<http://www.itpro.co.uk/data-protection/28085/what-is-the-data-protection-act-1998-2>

<https://www.equalityhumanrights.com/en/human-rights/human-rights-act>

### **Review**

Review of this policy shall be repeated regularly and whenever new equipment is introduced a review will be conducted and a risk assessment put in place. We aim to conduct reviews no later than every three years.

Signed:  Head of Pastoral Care

Signed  Head of Learning

Date: September 2022

Review Date: September 2023