# **Thomas Telford School**



# CCTV Policy Prepared by Dave Smith

# **CCTV Policy**

#### 1. Introduction

1.1. Cameras are located all over the school site. The purpose is to protect our property and people, and to detect and prevent crime or anti-social behaviour.

# 2. Objectives of the CCTV scheme

- 2.1. To protect the Academy 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 members of the public, staff, students, and private property.
- 2.6. To assist in managing the Academy.
- 2.7. To assist in managing good pupil behaviour and compliance with the behaviour and exclusion policies.

# 3. Principles - The following principles apply to our use of CCTV:

- 3.1. We install CCTV only if it is a necessary and proportionate way to deal with a problem.
- 3.2. We set up all cameras to ensure minimal intrusion into staff privacy.
- 3.3. We display signs prominently to inform that CCTV is in use.
- 3.4. We store images for no longer than 4 calendar weeks, unless they identify an issue and we need to retain a particular recording to investigate that issue.
- 3.5. We store images securely and have clear rules on who can gain access.
- 3.6. We may use the images in personnel management, including as evidence in staff disciplinary proceedings if necessary.
- 3.7. We may use the images in pupil disciplinary matters, including as evidence for sanctions up to and including permanent exclusions.

#### 4. Statement of Intent

- 4.1. The CCTV Scheme will seek to comply with the requirements of the Data Protection Act 2018 & the General Data Protection Regulations (GDPR) 2018.
- 4.2. The Academy will treat the system and all information, documents and recordings obtained and used as data which is protected by the Act & GDPR.
- 4.3. Cameras will be used to monitor activities within the Academy and its car parks and other public areas to identify criminal activity occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the Academy, together with its visitors.
- 4.4. Staff have been instructed those static cameras are not to focus on private homes, gardens, and other areas of private property.
- 4.5. Materials or knowledge secured because of CCTV will not be used for any commercial purpose. Recordings will only be released to the Police for use in the investigation of a specific crime and with the written authority of the Police. Recordings will never be released to the media for purposes of entertainment.
- 4.6. The planning and design of the system 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.
- 4.7. 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.

# 5. Operation of the System

- 5.1. The Scheme will be administered and managed by the IT Director, in accordance with the principles and objectives expressed in the code.
- 5.2. The day-to-day management will be the responsibility of Computer Services.
- 5.3. The CCTV system will be operated 24 hours each day, every day of the year.
- 5.4. The IT Director will check and confirm the efficiency of the system on a regular basis and that the equipment is properly recording and that cameras are functional.
- 5.5. Access to the CCTV facilities will be limited to the SLT, Heads of Year, Pastoral Team, the Building and Fabric Manager and Computer Services.
- 5.6. Unless an immediate response to events is required, the CCTV Control Room must not direct cameras at an individual or a specific group of individuals.
- 5.7. The system may generate a certain amount of interest. It is vital that operations are managed with the minimum of disruption.
- 5.8. When not manned the facility must be kept secured.

#### 6. Covert Recording

- 6.1. We will only use covert CCTV if:
  - 6.1.1. We are investigating suspected specific criminal activity or serious misconduct.
  - 6.1.2. The investigation's purpose would be severely prejudiced if the person or people under investigation knew about the surveillance.
  - 6.1.3. We have assessed alternative methods and can justify it as a proportionate way to obtain the required evidence.

### 7. Evidence from CCTV Recordings

7.1. We will use CCTV evidence against a member of staff, a student, or a visitor on site, only if we believe there is reason to. The student (and parents), member of staff or visitor will be able to see and respond to the footage, though images of third parties will be redacted.

#### 8. Your Entitlements

- 8.1. 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.
- 8.2. You have a right to view or receive a copy of recorded images of yourself. You should complete a Subject Access Request (SAR) form and submit this to the Headmasters Professional Assistant. Unless the images have already been automatically deleted to comply with our retention policy, we will provide a copy within 30 days of your request.

# 9. Breaches of the code (including breaches of security)

- 9.1. Any breach of the Code of Practice by school staff will be initially investigated by the headmaster, for him to take the appropriate disciplinary action.
- 9.2. 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.

# 10. Complaints

- 10.1. Any complaints should be made in writing and submitted to the headmaster.
- 10.2. Complaints will be investigated in accordance with our complaints procedures.

# 11. Summary of Key Points

- 11.1. This Code of Practice will be reviewed annually.
- 11.2. The CCTV system is owned and operated by the Academy.

- 11.3. The Control system is not open to visitors except by prior arrangement and good reason.
- 11.4. Liaison meetings may be held with the Police and other bodies.
- 11.5. Any recordings will be used properly, indexed, stored and destroyed after appropriate use.
- 11.6. Recordings may only be viewed by Authorised Academy Officers and the Police.
- 11.7. Recordings required as evidence will be properly stored and witnessed before copies are released to the Police.
- 11.8. Recordings will not be made available to the media for commercial or entertainment purposes.
- 11.9. Recordings will be disposed of securely by deletion.
- 11.10. Any breaches of this Code will be investigated by the headmaster. An independent investigation will be carried out for serious breaches.
- 11.11. Breaches of the Code and remedies will be reported to the headmaster.
- 11.12. We will maintain this policy in line with General Data Protection Regulations.

#### 12. Public information

12.1. Copies of this Code of Practice will be available to the public from the Information Commissioners Website (ICO).