

**Gillotts
CCTV Policy
(Code of Practice)**

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Gillotts CCTV Policy (Code of Practice)

I. Introduction

Gillotts School uses closed circuit television (CCTV) and the images produced to prevent or detect crime and anti-social behaviour; to monitor the school buildings and grounds to provide a safe and secure environment for its students, staff and visitors; to ensure school rules are respected so the school can be properly managed; and to prevent loss of or damage to school property.

The system comprises a number of fixed and dome cameras.

The system has sound recording capability which is not enabled.

The CCTV system is owned and operated by the school. Deployment and management of the system is the responsibility of the school's Leadership Team and the Business/Facilities Manager(s).

The CCTV is controlled centrally from the main server room adjacent to the IT Network team's office. Access to the images is controlled by the Facilities Manager (accessing images requires authorisation from a member of the leadership team) or in her absence the Business Manager. The system is password protected.

The introduction of CCTV monitoring was subject to a Privacy Impact Assessment (PIA) including consultation with staff and members of the school community.

The school's CCTV Scheme is registered with the Information Commissioner under the terms of The EU General Data Protection Regulation (GDPR) and the Data Protection Act 2018. The use of CCTV and the associated images are covered by data protection legislation. This policy outlines the school's use of CCTV and how it complies with the relevant legal requirements.

Through this policy, all operators are made aware of their responsibilities in following the Information Commissioner's Office (ICO) CCTV Code of Practice (<https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>). The school as Data Controller (through its Headteacher as the representative of the Data Controller and with the support of the Data Protection Officer) will ensure all relevant employees (see Appendix E) are aware of the restrictions in relation to, and disclosure of, recorded images by publication of this policy.

2. Operation

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

CCTV awareness signs are clearly and prominently placed at the main external front entrance to the school, with further signage in other key outdoor areas. Signs will detail the purpose for using CCTV (see Appendix A).

The original planning, design and installation of CCTV equipment endeavoured to ensure the scheme would deliver maximum effectiveness and efficiency although it is not possible to guarantee the system will cover or detect every single incident taking place in the areas of coverage.

The CCTV system will be in operation and recording 24 hours a day every day.

3. Siting the cameras

Cameras are sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure reasonable privacy expectations are not violated. The school will ensure the location of equipment is carefully considered to ensure images captured comply with relevant data protection legislation and any other regulatory requirements.

The school will make every effort to position cameras so their coverage is restricted to school premises.

CCTV will not be used in classrooms but in limited areas within the school buildings which have been identified as not being monitored easily or secured at all times.

Members of staff will have access to details of where CCTV cameras are situated with the exception of any cameras placed for the purpose of exceptional monitoring (see below).

4. Exceptional Monitoring

It is not the school's policy to conduct covert monitoring unless there are exceptional reasons for doing so.

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

- Where there is good cause to suspect an illegal action is taking place, or where there are grounds to suspect an action that would amount to gross misconduct or:
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording

In these circumstances, authorisation must be obtained from the Headteacher and Chair of Governors, and the Headteacher must be advised before any commencement of such covert monitoring. A written justification of reasonable belief that an exceptional circumstance applies must be retained, and a written report made to the next meeting of the Finance and Resources Committee.

Covert monitoring must cease immediately following completion of an investigation.

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

Recorded data will not be retained for longer than necessary. The images captured by the CCTV system will be retained for a maximum of 21 days except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

While retained, all data will be stored securely and the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of people whose images have been recorded.

6. Access to CCTV images

Access to recorded images will be restricted to those staff authorised to view them.

All requests to view images will be logged and this log be reviewed at least annually by the Data Protection Officer.

The CCTV software is installed on the Facilities Manager and IT Manager computers.

7. Subject Access Request (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under data protection legislation.

Individuals submitting a request for access will be expected to provide sufficient information to enable the footage relating to them to be identified. For example date, time and location.

The school will respond to requests within one month of receiving the written request.

Subject to the tools available to the school at the time of the request, the school may opt for JPEG images to be provided as stills of the video footage requested with any persons not involved having their faces pixelated/hidden.

The school reserves the right to refuse access to CCTV footage where this might prejudice the legal rights of other individuals or jeopardise an on-going investigation.

For further information, refer to the school's Data Protection Policy.

8. Access to and Disclosure of Images to Third Parties.

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police.

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

9. Complaints

Where parents/carers have concerns, they should contact the school's Business Manager.

In the event of a complaint, parents are advised to request a copy of the school's Complaints Procedure and submit a complaint in writing to the school's Business Manager.

10. Implementation and review

This policy was implemented after consultation with The Governing Body and the school community and will be reviewed by the Finance and Resources Committee in June 2020 and each year thereafter.

This policy may be amended from time to time without consultation to ensure compliance with the school's legal and regulatory obligations. A breach of this policy by any member of staff may be regarded as a disciplinary matter.

The date from which the policy will apply is the date of adoption by the Governing Body.

11. Further Information

Further information about CCTV and its usage is available from the following:

CCTV Code of Practice Revised Edition 2017 (published by the Information Commissioner's Office)
Version

www.ico.org.uk

Regulations of Investigatory Powers Act (RIPA) 2000

The EU General Data Protection Regulation (GDPR)

Appendix A

Example signage



Information on signage to include:

24 Hour CCTV recording in operation
Images are being recorded for the safety of our students, staff and visitors.
This system is controlled by Gillotts School.
For more information contact 01491 574315

Appendix B

Checklist

Item	Target date	Date complete	Notes
Privacy Impact Statement (Appendix C)	April 18	Sept 19	Following results of consultation
Confirm system quality of images	July 19	Ongoing	Quality assessed each time images are viewed
Agree siting of cameras as optimal for clear images and to avoid capturing images of the public not on site.	July 18	July 18	Informed by system supplier.
Image storage and retention process. Document process and responsibilities	Aug 19	Sept 19	Images are recorded on to a secure server. All equipment is password protected. Access is limited. Images are held securely for 21 days and are then deleted.
How to respond to SAR – document responsibilities	Aug 19	Sept 19	See list of responsibilities, appendix E
Daily checks to ensure all cameras are working – role responsible.	Aug 19	Jan 20	Facilities Manager
Produce list of all responsibilities.	Aug 19	Oct 19	See list of responsibilities, appendix E
Consultation June/July 19. Advise staff, students and parents of proposal – 24 hour CCTV inside and outside. Share draft policy and PIA. Invite comments.	3 -27 June 2019	27.06.19	
Review Consultation and take outcome to Governors for decision	July 19	02.07.19	89% of respondents strongly in favour. Govs approved 02.07.19
Visible signage	Aug 19	Sept 19	As advised by supplier
Notification to Information Commissioner's Office (ICO)	Aug 19	Jan 20	Communication via email

Appendix C

CCTV Privacy Impact Assessment

1. Introduction

1.1 The Purpose of this Privacy Impact Assessment (PIA) for CCTV is to ensure privacy risks are minimised whilst allowing the aims of the project to be met wherever possible and to ensure the use of CCTV takes into account the effect on individuals and their privacy.

1.2 Where such an assessment follows a formal documented process, such a process will ensure sound decisions are made on implementation and on any necessary measures to safeguard against disproportionate interference with privacy.

1.3 Personal data as defined by The EU General Data Protection Regulation means data which relates to a living individual who can be identified:

- a. From those data, or
- b. From those data and other information which is in the possession of, or is likely to come in to possession of the data controller

2. Camera Specific – Prior to installation

1	Why are cameras being considered for installation?	Cameras have been part of the school's out of hours security system prior to this project. We now wish to operate 24hpd and to install cameras inside the school to meet the aims of the CCTV policy
2	Has there been consultation before any additional cameras were installed and prior to extending times of operation?	Yes
2a	If yes, what was the outcome of the consultation	CCTV to be operational 24 hpd to external areas. CCTV internally to areas that are not regularly supervised. As of Sep 19 internally to OLC and school Hall. Further internal cameras to be approved by F&R Governors and reported to main Governors.
2b	If no, why wasn't it undertaken?	Not applicable
3	What type of cameras are being considered/in place	Static, standard lens.
4	Is audio recording an available feature of this camera	Yes
4a	If yes, what measure are in place to protect private dialogue?	It will be switched off
5	Do the cameras have any other camera specific or software related features such as Automatic Number Plate Recognition, Facial Recognition, movement analysis?	No
5a	If yes, what software/function	Not applicable
5b	What is the purpose of having/installing this function/software	Not applicable

5c	What measures are in place to protect privacy when using this software/function	Not applicable
6	Do the cameras have the capacity to record personal information as defined in paragraph 1.3	Yes
6a	If yes, explain what and why	<p>The CCTV system is used to prevent or detect crime and anti-social behaviour; to monitor the school buildings and grounds in order to provide a safe and secure environment for its students, staff and visitors; to ensure school rules are respected so the school can be properly managed; and to prevent loss of or damage to school property.</p> <p>The cameras can capture a range of images providing varying amounts of detail. When used to full potential they are able to capture identifiable images of individuals. Cameras are only used by trained operatives and the range of features available are only used by an operative when responding to an incident. Any actions taken or information released will in all cases be carried out in accordance with the EU GDPR, The Police and Criminal Evidence Act 1984 or the Criminal Procedures and Investigations Act 1996</p>
7	Is there any chance of this footage being released in the public domain?	Yes
7b	If yes, why and what are the controls in place	<p>Images from the school's CCTV system could be released by the police into the public domain if it is in the public interest such as the identification of a suspect involved in a crime, for public safety, national security or for example in the case of missing persons. In all cases this would be carried out in collaboration with the police and in accordance with data protection principles and the school's policy on CCTV.</p> <p>The school will not itself release images into the public domain.</p>
8	Is there a GDPR compliant sign clearly displayed in close proximity to the cameras to make people aware CCTV is in operation?	Yes
9	Do the cameras cover any part of any property where there is an expectation of privacy?	No
9a	If yes, what is covered	Not applicable
9b	If yes, what measures have been taken to prevent observation of these area?	Not applicable

3. Camera Specific – Post installation

1	Has the purpose of the cameras been reviewed?	Yes. Part of consultation process.
1a	How frequently will this be reviewed?	Annually/as required/with each new installation.
1b	What was the outcome of the review?	Additions made to cover more of the external space. More additions to be made as affordable
2	Has the school ever received a complaint relating to the impact of privacy of any camera?	No
2a	Provide details of the source and nature of the complaint and the outcome	N/A

Privacy Impact Assessment carried out by Name	Glynis Smith
Position	Business Manager
Data Protection Officer Name	Turn IT On
Position	
Assessment effective dates From	June 2022
Until review due on	June 2023
Registration with the Information Commissioner last updated on	January 2020
Checks for serviceability of CCTV systems and clarity of images completed on	Ongoing

Appendix D - CONFIDENTIAL

Areas on the school site covered by CCTV camera, whether active or not

Number	Camera location/area covered	Number	Camera location/area covered
1	CONFIDENTIAL		
2			
3			
4			
5			
6			
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18			
19			

Appendix E – Responsibilities

Responsibility	Post/person responsible	Notes
Storage of Images	IT Technician	Ensuring images are only kept for the maximum allowable amount of time. System automatically deletes any images over 21 days old. This can be easily checked as the calendar on the software shows the recorded days.
Ensure all cameras are operational	Facilities Manager	Part of daily sign on process
Arrange service/repair	Facilities Manager	
Maintain log of access requests from staff.	Facilities Manager	Ensuring permission has been provided by a member of the Leadership Team
Approve access request	Member of the Leadership Team	
Annual report to F&R	Business Manager	June meeting each year. To include a review and approval for any internal cameras thought necessary.
Review operation and make recommendations/give approval for updates.	F&R Governors	Receive annual report on CCTV Receive updates on SAR requests Consider/approve additional internal cameras as requested by the school Report to Main Governors
SAR request – approval to proceed with response	Headteacher	
SAR request - response	Business Manager	Report to next F&R meeting. NB School must respond to any SAR requests within one month.

Reviewed 06.06.22