



Range High School

CCTV Policy

(GDPR)

Person responsible for Policy:	Resources Director
Date of last review:	January 2024
Date of next review:	April 2027 (3-yearly review) - major changes will be brought to the Trustees' attention as, and when they occur

RESPONSIBILITY FOR THIS POLICY HAS BEEN DELEGATED TO THE HEADTEACHER

INTRODUCTION

Range High operates CCTV on this site to ensure the smooth operation of our school and to provide a safe and secure environment for all of our students, staff and visitors. It is used to help reduce crime by monitoring the school buildings and to prevent the loss or damage to school property. It may also be used, when deemed necessary by the Headteacher, to investigate issues of discipline.

This Policy outlines the activities of those involved in the operation and installation of a school CCTV system. The Policy will follow the guidelines published by the Home Office and the Information Commissioners Office (ICO) on the use of CCTV in public places.

The System

The system comprises of a number of dome cameras situated both internally and externally to the school. The system does not have a sound recording capability.

Maintenance checks

Cameras will be checked daily to ensure that they are operational. Recorders will be checked once a month to ensure that they are recording and it is possible to download images. The whole system is serviced annually by the School's preferred contractor as part of a maintenance contract that exists between both parties.

Camera fixings will be checked to ensure safety and security, during planned maintenance e.g. cleaning cameras.

Repairs will be made to the system within two weeks if practical, dependent upon cost and CCTV

Review

Camera images can be recorded and displayed on a computer situated in the office of the Resources Director. No other staff have access to the CCTV Camera footage.

Additional viewing and monitoring can be enabled from the Resources Director's laptop for instances that may occur out of hours (e.g. Alarm activation). This facility is view only and does not permit the saving of images to the hard drive.

The recorded images are stored on the hard drives of the control units situated in secure locations around school – these images are automatically overwritten after 7 weeks.

GDPR

The system shall be used in accordance to all relevant laws and guidelines, including the GDPR 2018, The Human Rights Act 1998 and if appropriate Regulation of Investigatory Powers Act 2000.

Signage

Signs are displayed in main reception and within the area covered by the system to inform staff, students and the public.

Purpose of CCTV

The system is intended to provide and promote a safe secure environment for students and for those who work or use the facilities of the school; and to protect the school buildings and resources. It is hoped that it will prevent crime and anti-social behaviour within the location.

The system is intended to view and monitor activity in the immediate area of the school and school grounds only.

It shall be used for the purpose of:

- Outside area monitoring
- Safeguarding
- Site Security
- Health and Safety of students, staff and public
- Preventing and deterring crime & aggressive or antisocial behaviour
- Students, staff and public safety,
- Supporting the investigation issues of discipline
- Facilities management.

This will achieve this by:

- enabling the viewing of live footage
- providing evidential quality images of reported incidents or allegations
- assisting the responsible authorities in the investigation of policies, procedures, crime & disorder.

Siting the Cameras

Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated.

The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with GDPR. The school will make every effort to position cameras so that their coverage is restricted to the school premises, including outdoor areas.

CCTV will not be used in classrooms but may be used in areas within school that have been identified by staff and pupils as not being easily monitored.

Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring – see below.

Covert Monitoring

Only with the express permission of the Headteacher and/or the Chair of Trustees will school use covert cameras. They may be used in exceptional circumstances and will be immediately removed once their purpose has been served. For example, covert monitoring may be used:

- Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

Covert monitoring must cease 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.

Management of the System

The overall management of the system is the responsibility of the Governing Board of the school, who have appointed the Headteacher and the Resources Director for the function of Data Controllers.

The system will be managed in accordance with all relevant legislation.

The day-to-day management and security of the control equipment and data is the responsibility of the Resources Director who will follow the data protection guidelines with regard to access to the system.

Incident Reporting

If an incident or allegation is received by the school then CCTV can be used to recall footage for viewing. In these incidents footage will be viewed by the Resources Director in the first instance to ascertain whether a breach of any School Policy or Procedures has occurred. The Resources Director will log the incident details and report to the appropriate member of the Senior Leadership Team of their findings.

If a breach has occurred then the necessary action will be taken in line with School Policy and Procedures

The Resources Director will record the following in a CCTV register:

- Who carried out search and/or copied of the event.
- Persons present for the viewing
- Date, start and end time of the incident.
- Date and time of the review/copy.
- Reason for viewing the footage (e.g. damage caused/complaint)
- If applicable this record must include the details of the officer or authorised agent, collecting the copied media and their contact details.

Criminal & Suspicious Activity

During monitoring, if criminal or suspicious activity is of a serious nature then, after consulting with the Headteacher, the Resources Director should immediately inform the Police. Once an incident is reported to the Police it will be dealt with in accordance with Police procedure.

Storage of Recorded Images and their Viewing

- The storage space shall be dust and moisture proof.

- Viewing or copying will be carried out only if it would assist the school in supporting procedures for which the Head teacher is responsible or to address one of the issues stated in the 'purpose of CCTV'.
- Recorded images are not to be taken away from the school premises under any circumstances unless deemed necessary by the Police/Investigators/relevant authority for criminal activities
- A record of viewing and copying must be noted in the CCTV register.

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to them under the Freedom of Information Act. Downloaded footage should be deleted after 28 calendar days unless otherwise requested by the Headteacher.

Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified (e.g.: date, time and location). The requests will be dealt with in line with the school GDPR Policy. The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation. The school will respond to requests within 20 calendar days of receiving the written request.

Staff Training

The Head teacher shall ensure that all appropriate staff are trained on the use of the equipment and are familiar with their data protection responsibilities as detailed in the ICO's CCTV code of practice 2008.

Complaints

Any complaints about the schools CCTV system should be addressed to the Head teacher. Complaints will be investigated in accordance with this Policy and the School's Complaints Policy. Breaches of the Policy or misuse of recorded imagery or the system will be a disciplinary offence. Any breaches of this policy by school staff will be individually investigated by the Headteacher and appropriate disciplinary actions taken. Disciplinary action can also include prosecution under the data protection act and criminal proceedings.

Statement of Intent

The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.