



HILBRE HIGH SCHOOL HUMANITIES COLLEGE

CCTV SYSTEM POLICY

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1. Introduction

- 1.1 The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at **Hilbre High School Humanities College**, hereafter referred to as 'the school'.
- 1.2 The system comprises of a number of fixed and moveable cameras, located in prominent positions around the school site and within full view of persons using the school. Student toilets are included in order to protect students from bullying, to detect smoking and to monitor against acts of wilful damage to school property. Only the 'communal' areas of the toilets are covered by the cameras. Cubicles and urinals are not covered. The recording of the data is by a hard drive digital system. The camera situated in the Reception Area has audio recording.

There are a number of cameras situated both externally and internally around the site. These can be monitored from the Business Manager's Office and the ICT Department, where the main user control interfaces are located. The system is password controlled, therefore, allowing restricted monitoring access to the Senior Leadership Team, Business Manager, ICT Network Manager and SPIE Caretakers and all other staff members, as directed by the Senior Leadership Team.

This system is maintained via the PFI scheme by the FM provider.

- 1.3 This Code follows Data Protection Act 2018 guidelines.
- 1.4 The Code of Practice will be subject to review annually to include consultation as appropriate with interested parties.
- 1.5 The internal CCTV system is owned by the school and the external one is owned by WSSL.

2. Objectives of the CCTV scheme

- 2.1 To protect the school buildings and their assets.
To increase personal safety and reduce the fear of crime.
To support the Police in a bid to deter and detect crime.
To assist in identifying, apprehending and prosecuting offenders.
To protect members of the public and private property.
To assist in managing the school.

3. Statement of intent

- 3.1 The school will treat the system and all information, documents and recordings obtained and used as data as being protected by the Act.
- 3.2 Cameras will be used to monitor activities within the school, including cycle pounds, its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well being of students, staff and visitors.
- 3.3. The static cameras will not focus on private homes, gardens and any other areas of private property. Authorised users are fully aware that any moveable cameras should not be focused on private homes, gardens and any other areas of private property.

- 3.4 Images or knowledge obtained as a result of CCTV will not be used for any commercial purpose. Data, photographic or digital information will only be released to the media for use in the investigation of a specific crime and with the written authority of the Police and will never be released to the media for purposes of entertainment.
- 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 Information Commissioner, have been placed at all access routes to areas covered by the school CCTV.

4. Operation of the system

- 4.1 The Scheme will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in the Code.
- 4.2 The day-to-day management will be the responsibility of the Senior Leadership Team, the Business Manager and the ICT Network Manager, out of hours and at weekends.
- 4.3 The CCTV system will normally operate 24 hours each day, every day of the year and images are recorded over in a cycle.
- 4.4 Existing school emergency procedures (detailed elsewhere) will be used in appropriate cases to call the Emergency Services.

5. Liaison

- 5.1 Liaison meetings may be held with all bodies involved in the support of the system.

6. Monitoring procedures

- 6.1 Camera surveillance may be maintained at all times.
- 6.2 Monitors will normally be on at all times and pictures will be continuously recorded.
- 6.3 Data may be viewed following the permission of a senior member of staff, by school staff and the Police for the prevention and detection of crime.
- 6.4 A record will be maintained of the release of DVDs to the Police or other authorised applicants. A register will be available for this purpose.
- 6.5 Viewing of DVDs by the Police must be recorded in writing and in the log book. Requests by the Police can only be dealt with under Section 29 of the Data Protection Bill (2018).
- 6.6 Should data be required as evidence, 2 DVD copies will be recorded and 1 will be retained by the school, the second released to the Police on the clear understanding that the DVD remains the property of the school, and both the DVD and information contained on it are to be treated in accordance with this Code. The school also retains the right to refuse permission for the Police to pass to any other person, the DVD or any part of the information contained thereon.

6.7 The Police may require the school to retain the copy DVD for possible use as evidence in the future. Such data will be properly indexed and properly and securely stored until they are needed by the Police.

6.8 Applications received from outside bodies (eg. solicitors) to view or release DVDs will be referred to the Headteacher. In these circumstances DVDs will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order.

7. Breaches of the Code (including breaches of security)

7.1 Any breach of the Code of Practice by adults on site will be initially investigated by the Headteacher or nominated colleague, in order for him/her to take the appropriate disciplinary action or inform the FM provider's management team.

7.2 Any serious breach of the Code of Practice will be immediately investigated to make recommendations on how to remedy the breach.

8. Assessment of the Scheme and Code of Practice

8.1 Performance monitoring, including random operating checks, may be carried out by the Business Manager or the ICT Network Manager.

9. Complaints

9.1 Any complaints about the school's CCTV system should be addressed to the Headteacher.

9.2 Complaints will be investigated in accordance with this Code.

10. Access by the Data Subject

10.1 The Data Protection Bill provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.

10.2 Requests for Data Subject Access should be made to the Headteacher.

11. Public information

Copies of this Code of Practice will be available to the public from the Main School Office, upon request.

Summary of key points:

- This Code of Practice will be reviewed every 2 years.
- The CCTV system is owned and operated by the school and the FM provider.
- Liaison meetings may be held with the Police and other bodies.
- Recording DVDs will be used properly indexed, stored and destroyed after appropriate use.
- Data and DVDs may only be viewed by authorised school staff and the Police.
- Data and DVDs required as evidence will be properly recorded, witnessed and packaged before copies are released to the Police.
- DVDs will not be made available to the media for commercial use or entertainment.
- When appropriate, DVDs will be disposed of securely.

- Any breaches of this Code will be investigated by the Headteacher or nominated representative.
- Breaches of the Code and potential remedies will be reported to the Headteacher.