

Hazelwood Schools

CCTV Policy



Reviewed and Adopted: Autumn 2022

Reviewed by: Resources Committee

Next Review: Autumn 2025

Review every three years

1. Purpose / Policy Statement

- 1.1** The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) system and Hazelwood Schools.
- 1.2** This policy applies to all members of our workforce, visitors to the school premises and all other persons whose images may be captured by the CCTV system.
- 1.3** This policy takes account of all applicable legislation and guidance, including:
- General Data Protection Regulation (GDPR)
 - CCTV Code of Practice produced by the Information Commissioner
 - Human Rights Act 1998
 - RIPA (Regulation of Investigatory Powers Act 2000)
- 1.4** The system is administered and managed by the Hazelwood, which acts as the Data Controller (as defined by DGPR). This policy will be subject to review from time to time, and should be read with reference to the School's Privacy Notice(s). For further guidance, please review our CCTV Code of Practice.
- 1.5** CCTV systems are installed (both internally and externally) in premises for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or the external environs of the premises during both the daylight and night hours each day. CCTV surveillance at Hazelwood is intended for the purposes of:
- Protecting the school buildings and school assets , both during and after school hours
 - Promoting the health and safety of staff, pupils and visitors
 - To protect the Schools' buildings and equipment, and the personal property of all members of the Schools' community, visitors and members of the public, from damage, disruption, vandalism and other crime
 - Reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
 - To act as a deterrent against crime
 - Supporting the police in a bid to deter and detect crime and assist in the identification, apprehension and prosecution of offenders
 - Assist in identifying, apprehending and prosecuting offenders
- 1.6** This system comprises of a number of internal and external cameras and does not have sound recording capability.
- 1.7** The introduction of, or changes to, CCTV monitoring will be subject to consultation with the staff and governors where appropriate.
- 1.8** The School's CCTV is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and the General Data Protection Regulation (DGPR) 2016/679.
- 1.9** This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation, e.g. race, gender, sexual orientation, national origin, disability etc.
- 1.10** Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

- 1.11 Access and viewing is restricted and all authorised operators and employees with access to images are aware of the procedure that need to be followed when accessing the recorded images. All operators are made aware of their responsibilities in following the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of recorded images.
- 1.12 Adequate signage of has been placed in prominent positions to inform members of Hazelwood Schools community, visitors and members of the public that they are entering a monitored area.

2. Siting of cameras

- 2.1 The CCTV system is owned and operated by the school and the deployment of which is determined by the school's leadership team.
- 2.2 The CCTV is monitored centrally from the site managers office and is also available in the main office.
- 2.3 The cameras will be sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated. For example, camera will not be placed in areas which are reasonably expected to be private such as toilets. The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act / GDPR requirements.
- 2.4 The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by the policy, e.g. CCTV will not be used for monitoring employee performances.
- 2.5 CCTV is not sited in classrooms and will not be used in such, except in exceptional circumstances and prior authorisation from the resources committee.
- 2.6 Cameras are placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

3. Maintenance

- 3.1 The system will be operational 24 hours a day, every day of the year.
- 3.2 The Site Team will check and confirm that the system is properly recording and that cameras are functioning correctly, on a regular basis.
- 3.3 The system will be checked and (to the extent necessary) serviced no less than annually.

4. Covert monitoring

- 4.1 The school retains the right in exceptional circumstances to set up covert monitoring. For example:
 - Where there is good cause to suspect that an illegal or serious 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 will not be undertaken by the school, however enforcement, such as police will be authorised to undertake monitoring as part of an investigation, should it be required.

- 4.2** In these circumstances, authorisation must be obtained beforehand from the Head Teacher and Chair of Governors.
- 4.3** Covert monitoring may take place in classrooms when the above circumstances are satisfied.
- 4.4** Covert monitoring will cease following completion of an investigation.
- 4.5** Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, e.g. toilets.

Covert monitoring

Hazelwood Schools will not directly engage in covert surveillance, however enforcement, such as police services will be granted access to covert monitor to support investigations following illegal activities.

5. Storage and retention of CCTV images

- 5.1** Recorded data will not be retained for longer than 30 days except where the image identifies an issue and is retained specifically in the context of an investigation / prosecution of the issue.
- 5.2** Where data is retained for longer than 30 days, an electronic field held on a secure central server where specific CCTV image/recordings are retained will be kept. The Data Protection Act and GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention will reflect the School's purposes for recording information and how long it is needed to achieve this purpose.
- 5.3** The school will store data securely at all times.
- 5.4** Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV is the responsibility of the Headteacher. The Headteacher may delegate the administration of the CCTV System to another member of staff.
- 5.5** In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

6. Access to CCTV images

- 6.1** Access to recorded images will be restricted to the staff authorised to view them and will not be made widely available. Supervising the access and maintenance of the CCTV system is the responsibility of the Headteacher. The Headteacher may delegate the administration of the CCTV System to another member of staff. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

- 6.2** A written record access will be made. Records of access will be kept and held securely, of all disclosures which sets out:
- When the request was made
 - The process followed in determining whether the images contained third parties
 - The considerations as to whether to allow access to those images
 - The individuals that were permitted to view the images and when
 - Whether a copy of the images was provided, and if so to whom, when and in what format
- 6.3** A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.
- 6.4** There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police and service providers to the School where these would reasonable need access to the data, e.g. investigators.
- 6.5** In relevant circumstances, CCTV footage may be accessed:
- By police where Hazelwood Schools are required by law to make a report regarding the commission of a suspected crime; or
 - Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on Hazelwood Schools property, or
 - To HSE and/or any other statutory body charged with safeguarding; or
 - To data subjects (or their legal representatives), pursuant to a Subject Access Request or
 - To individuals (or their legal representatives) subject to a court order.
 - To the school insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.
- 6.6** If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

7. Disclosure of images to Data Subjects (Subject Access Request)

- 7.1** Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation and has the right to request access to those images.
- 7.2** Any individual who request access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation.
- 7.3** All requests should be made in writing to the Headteacher. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified, for example, date, time and location.
- 7.4** When a request is made, a member an authorised member of staff will review the CCTV footage in accordance with the request:
- If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. Appropriate

measures must be taken by an authorised member of staff to ensure that the footage is restricted in this way.

- If the footage contains images of other individuals then the School must consider whether:
 - The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
 - The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
 - If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request

7.5 In giving a person a copy of their data, the school provide a still/series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

7.6 Where footage contains images relating to 3rd parties, the school will take appropriate steps to mask and protect the identities of those individuals.

7.7 The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

Responsibilities

The Headteacher (or nominated member of staff) will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Hazelwood Schools
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at Hazelwood Schools is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access to or (e.g. an access log) to or the release of tapes or any material recorded in stored in the system
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place
- Co-operate with the Health & Safety Officer in reporting on the CCTV system in operation in the school
- Ensure that external camera are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of 'Reasonable Expectation of Privacy'
- Ensure that monitoring footage is stored in a secure place with access by authorised personnel only

- Ensure that images recorded are stored for a period not longer than 30 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil)
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

Appendix A – Internal Storage

Log of stored CCTV images (specific footaged stored for longer than standard period)

Date Stored	Who by	Image/file reference	Reason for retention	Please state the format these images are being stored (e.g. CD ROM/Hard Drive/Flash Drive)	Please state the date the footage was erased, by whom and why	Signed off by designated member of SLT Date

Appendix B – External Requests

Subject Access & Third Party Request Disclosure Log

Date request received and from whom (name and organisation)	Date referred to DPO	Subject Request or Third Party Request	Access or Third Party Request	State the reason (if third party)	Date & nature of disclosure (viewing or copy of image)	Images viewed/sent (state location, date, time of original image/s and internal image reference)	The outcome if applicable

Appendix C

CCTV Monitoring Log

Date	Time	Name	Reason

Appendix D

CCTV Signage

It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The School is to ensure that this requirement is fulfilled. The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for enquires

Example sign



Warning

CCTV cameras in operation

Images are being monitored and recorded for the purpose of crime-prevention the prevention of anti-social behaviour, for the safety of our staff and students and for the protection of the School and its property. This system will be in operation 24 hours a day, every day. These images may be passed to the police.

**The scheme is controlled by the School
For more information contact: 020 8886 3216**