



the *King's* school

specialising in maths and computing

# CCTV Policy

### Statement of Intent

The King's School (TKS) takes its responsibility towards the safeguarding of students, employees and visitors very seriously. To that end, Closed Circuit Television (CCTV) cameras are used to undertake surveillance to support and improve security procedures and to support behaviour management outside of classrooms. A school is a place of work, where security and safety are reasonable expectations for all users of the building and CCTV can play a part in meeting those proper expectations. We believe that the use of surveillance CCTV supports the safety of our staff, students and visitors whilst on site but acknowledge that we will always consider proportionality in its deployment and use.

The law states that a CCTV system may be used to monitor the school premises, providing our system complies with all statutory requirements and codes of practice that are in force and relevant, in particular the Data Protection Act 1998.

The purpose of TKS CCTV Policy is to manage and regulate the use of the CCTV system and ensure that:

- TKS complies with the Data Protection Act 1998.
- The images that are captured are useable for the purposes we require them for.
- Reassure those persons whose images are being captured.

This policy covers the use of CCTV and other systems which capture moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes:

- Seeing what an individual is doing.
- Taking action relating to a crime.
- Using images of an individual in some way that could affect their privacy.

### Aims and Objectives

The CCTV system is used specifically to:

- Maintain a safe environment by improving security procedures;
- Support behaviour management outside of classrooms;
- Ensure the welfare of students, staff and visitors;
- Deter criminal acts against persons and property;
- Assist the police in identifying persons who have committed an offence.

### Scope and Responsibility

This policy applies to:-

- Students whilst undergoing education;
- Staff whilst working as employees of the School;
- Visitors to the School including contractors.

## Context

This policy should be considered in the context of:

- The King's School Health and Safety Policy;
- The King's School relevant Safeguarding Policies;
- The Control of Contractors Policy;
- The Freedom of Information Policy;
- The Data Protection Policy.

## Protocols

The CCTV system will be registered by the Pontefract Academies Trust (PAT) with the Information Commissioners' Office (ICO) under the terms of the Data Protection Act.

The system will comply with all statutory requirements and codes of practice that are in force and relevant, including:

- The Commissioner's Code of Practice for CCTV 2008.
- The Surveillance Camera Code of Practice 2013, published by the Home Office.

The CCTV system is a closed digital system which does not make audio recordings and has no wireless capability/has a secure wireless capability.

Warning signs have been placed throughout the premises where the CCTV system is active, as mandated by the Code of Practice of the Information Commissioner.

The CCTV system has been designed for maximum effectiveness and efficiency. The school cannot however guarantee that every incident will be detected or covered and 'blind spots' do exist.

The CCTV system will not be trained on individuals unless an immediate response to an incident is required.

Additionally, the CCTV system will not be trained on private vehicles or property outside the perimeter of the school.

Recordings will only be released following written authority from the Police, or in respect of a subject access request.

## Security

Access to the CCTV system, software and data will be strictly limited to authorised operators and password protected.

TKS's authorised CCTV system operators are:

- Members of the Senior Leadership Team;
- Members of the Facilities Management Team.

The main control facility is kept secure and locked when not in use.

If covert surveillance is planned, or has taken place, copies of the authorisation forms and review will be completed and retained.

Camera systems may be maintained at all times.

A plan is available from the Business Manager outlining the location of the visual display monitors and cameras and will be shared if deemed to be appropriate.

### **Privacy**

Live and recorded materials will only be viewed by authorised operators for the purpose of investigating incidents.

Images, both still and moving, may be released to the police for the detection of crime under section 29 of the Data Protection Act 1998.

Viewing of images by the police will be recorded in the Security Incident Report log.

Applications received from outside bodies (e.g. solicitors) to view or release images will be referred to the Headteacher and advice may be taken from the PAT.

In circumstances where outside bodies make requests to view or release images, the Headteacher will normally release them provided satisfactory documentary evidence is produced to show that they are required for legal proceedings, a subject access request, or in response to a Court Order.

A fee may be charged at £10 in such circumstances, which is appropriate for subject access requests.

Images will only be retained for as long as they are required. The system will automatically delete recordings after 14 days in accordance with the Data Protection Act 1998.

### **Code of Practice**

TKS has a CCTV surveillance system in place for the purpose of the meeting the aims and objectives of this policy and to ensure that its operation is consistent with the obligations on TKS imposed by the Data Protection Act 1998. The policy is available from the school's website.

The system is owned by TKS and images from the system are strictly controlled and monitored by authorised personnel.

The system will:

- Always be for the purpose specified, which is in pursuit of a legitimate aim.
- Be designed to take into account its effect on individuals and their privacy and personal data.
- Be transparent and include a contact point through which people can access information and complaints.
- Have clear responsibility and accountability for images and information collected, held and used.
- Have defined policies and procedures in place which are communicated throughout the school.

- Only keep images and information for as long as required.
- Restrict access to retained images and information with clear rules on who can gain access
- Consider all operational, technical and competency standards relevant to a system and its purpose, and work to meet and maintain those standards in accordance with the law.
- Be subject to stringent security measures to safeguard against unauthorised access and use.
- Be regularly reviewed and audited to ensure that policies and standards are maintained.
- Be used only for the purposes for which it is intended, including supporting public safety, protection of pupils and staff and law enforcement.
- Be accurate and well maintained to ensure information is up-to-date.

## Access

Requests for access will be handled in accordance with our Data Protection Policy.

All disks containing images belong to and remain the property of TKS. Data handling procedures which are in place to ensure the integrity of the image information held can be found in our Data Protection Policy.

Requests by persons outside the school for viewing or copying disks, or obtaining digital recordings, will be assessed by the Headteacher on a case-by-case basis with close regard to Data Protection and Freedom of Information legislation.

It is important that access to, and disclosure of, the images recorded by CCTV is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved but also to ensure that the chain of evidence remains intact should the images be required for evidential purposes.

Releasing the recorded images to third parties will be made only in the following limited and prescribed circumstances and to the extent required or permitted by law:

- **The police** - where the images recorded would assist in a specific criminal inquiry.
- **Prosecution agencies** - such as the Crown Prosecution Service (CPS).
- **Relevant legal representatives** - such as lawyers and barristers.
- Persons who have been recorded and whose images have been retained where disclosure is required by virtue of the Data Protection Act 1998 and the Freedom of Information Act.

Requests for access or disclosure will be recorded and the Headteacher, in partnership with the PAT if necessary, will make the final decision as to whether recorded images may be released to persons other than the police.

## Roles and Responsibilities

### Pontefract Academies Trust

As the employer and Data Controller, the Pontefract Academies Trust has ultimate responsibility for managing the use of CCTV in Trust schools.

## The Governing Body

- The Governing Body is responsible for CCTV issues and shall ensure that there is an effective CCTV Policy implemented, monitored and reviewed.
- The Governing Body will ensure that the objectives set out in CCTV Policy are achieved.
- It will give full support to this policy and to any persons implementing it.
- It will ensure that necessary resources are made available.

## Health and Safety Committee

The Health and Safety Committee as a whole, or through individual members, monitor the usage of CCTV and recommend any action necessary should this performance appear or prove to be unsatisfactory. This forum is utilised as a platform for union consultation and the main functions of the Committee will be to:

- Satisfy the statutory function within current legislation.
- To monitor the implementation of TKS CCTV Policy and resulting strategies, plans and action programmes.
- To take a lead role in the active consultation and promotion of the usage of CCTV and ensure the adequacy of related publicity and communications.
- To keep under review the CCTV Policy and procedures and advise the Governors and the Senior Leadership Team from time to time of beneficial changes.
- To consider new legislation/guidance and assist in its dissemination.
- To consider reports received from external regulatory/advisory bodies.
- To receive reports on the use of CCTV and data collected at least annually or more frequently as circumstances dictate, such as major variation or usage.
- To consider training requirements and promote suitable training programmes.

## The Headteacher

- Has overall responsibility, on behalf of the Governing Body, to ensure, so far as is reasonably practicable, that the requirements of relevant legislation and Codes of Practice and TKS CCTV Policy is implemented, adhered to and complied with.

## The Senior Leadership Team

Members of the Senior Leadership Team will:

- Ensure that the requirements of the CCTV Policy form an integral and effective part of operational management.
- Ensure that all accidents, security incidents, near misses and dangerous occurrences are investigated and that reports are completed and submitted promptly to the Business Manager within 3 days enabling a review of any CCTV footage.

## The Business Manager

The Business Manager will:

- Have primary responsibility for ensuring that TKS meets the aims and objectives set out in the CCTV Policy.
- Will ensure that responsibility for managing CCTV is properly assigned and accepted at all levels.

- Advise the Governing Body, Headteacher and all other parties on CCTV related matters including compliance on related legislation.
- Ensure that the Facilities, Health & Safety Manager assumes day to day operational management of the CCTV system.
- Facilitate consultations with employees, students and other key stakeholders and encourage their involvement and participation in measures to effectively manage the use of a CCTV system by means of the Health and Safety Committee, personal contacts etc.
- Facilitate consultations with employees, students and other key stakeholders regarding any proposed new CCTV installations.
- Communicate with external bodies on CCTV matters.
- Support and advise the Governors' Health and Safety Committee Meetings.
- Assist in the identification and fulfilment of staff CCTV training needs ensuring budgetary provision.
- Ensure the inclusion of relevant CCTV responsibilities in staff job descriptions.
- Draft reports on the use of CCTV and data collected at least annually or more frequently as circumstances dictate, such as major variation or usage.
- Lead on policy development in relation to CCTV issues.

The Facilities Health and Safety Manager has responsibility for:

- Assuming day to day operational management of the CCTV system.
- Ensuring that signs are displayed in prominent areas of TKS advising that the use of CCTV is in operation to ensure compliance with statutory requirements.
- Organising inspections and servicing of the CCTV system.
- Supporting the Business Manager to investigate all Security, Accident, Incidents and Near Misses by undertaking investigations and providing copies of the relevant CCTV footage.

All School Employees and Students

Employees and students have a responsibility to co-operate with line managers and are expected to be conversant with the policy and assist in its implementation within their sphere of influence.

Staff Safety Representatives

TKS wishes to actively encourage the appointment of employee safety representatives. The function of Safety Representatives will be to communicate relevant updates to their members and provide feedback to the Business Manager on any proposed changes to the CCTV system.

**Publicity**

The Policy will be posted on the Shared (G) drive of the School's IT Network and the School's website.

**Monitoring and Evaluation**

Bi-annually the effectiveness of this policy will be reviewed, or when the need arises, and the necessary recommendations for improvement will be made to the governors.