

## **CLOSED CIRCUIT TELEVISION (CCTV) SYSTEM POLICY**

This policy is prescribed by The Good Shepherd Trust and is non-statutory. All references to 'the Trust', includes all Trust schools and subsidiary organisations.

The Trust and governing body (we) believe that the school provides an excellent education and that the Principal School Leader and Trust personnel work very hard to build positive relationships with all parents/carers and others.

### **Definitions**

- The school – Ottershaw Christ Church C of E Schools
- The Trust – The Good Shepherd Trust
- Data Protection Officer – Peter Coates
- CCTV Operator – Employees of the Trust with the skills and permission to operate the CCTV and retrieve footage

### **Introduction**

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at school. The system comprises a number of static cameras located around the school site. All cameras can be monitored from the Main Reception but are only available to designated staff. This code follows GDPR guidelines.

The CCTV system and data is owned by the Trust.

### **Objectives of the CCTV system**

The Trust recognises the need to ensure the safety of students, visitors and property located on the School site. The purpose of the CCTV system is:

- To protect the school buildings and assets of the Trust
- To increase personal safety of staff and visitors 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; and
- To assist in managing the school

### **Statement of Intent**

The CCTV system will be registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and Commissioner's Code of Practice.

The Trust will treat the system, and all information, documents and recordings obtained and used, as data which are protected by the Data Protection Act.

The system installed is compliant with the Data Protection Act, Human Rights Act and Regulatory Investigation Powers Act.

Cameras will be used to monitor activities within the Trust and 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 wellbeing of the Trust and its staff, pupils and visitors.

Cameras are focused on the school entrances/exits.

Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property. However, it is important they understand that, whilst on the premises, they may be recorded from time to time on surveillance video tape and that they have consented to this. As this policy details, there are however strict security controls over this recorded data and under normal circumstances no such data will be retained longer than 7 days. Any questions about data held in this way should be addressed to the Principal School Leader in the first instance.

Materials of knowledge secured as a result of CCTV will not be used for any commercial purpose. CCTV footage will only be used for the investigation of a specific crime or incident. Release to media would only be allowed with the written authority of the police if this was required by them as part of a police investigation.

Request to view CCTV footage is to be in writing to the Principal School Leader.

The planning and design has endeavoured to ensure that the system 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.

Warning signs, as required under the Data Protection Act, have been placed at key points on the exterior fencing.

### **Operation of the system**

The CCTV system will be administered and managed by the School Business Manager, the Office Manager at the Infants School and the ICT Network Manager, in accordance with the principles and objectives expressed in the policy.

The day-to-day management will be the responsibility of both the ICT Network Manager during normal working hours and the site manager during out of hours and at weekends.

The CCTV system will be operated 24 hours each day, every day of the year. Any event that requires CCTV footage during the day will be the responsibility of the School Business Manager for internal events and the site manager for external events.

The ICT Network Manager will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.

### **Monitoring procedures**

CCTV access will only be used to identify a specified event. The CCTV system will not be used to monitor live events unless authorised by the Principal School Leader.

The system will only be used by designated users and will not be used by other members of the Trust.

### **Image storage procedures**

In order to maintain and preserve the integrity of the disk used to record events from the CCTV system and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

- Footage may be saved to a network user area in order to be used when dealing with an incident. Once the event has been dealt with the footage should be copied to a CD or DVD and stored in the Main Office Safe.
- Footage must never be sent to an individual outside the Trust for any purpose without written permission from the Principal School Leader.
- Footage saved to removable media (CD/DVD) should be clearly labelled with the time and date of the event and a description of the location.
- The individuals appearing in the footage must not be labelled on the media.
- Media must be stored in the safe located in the Main School office when not in use.
- Should any media be taken by a member of the Police, a copy must be made first.
- The Trust also retains the right to refuse permission for the Police to pass to any other person the disk or any part of the information contained.
- The Police may require the Trust to retain the stored disks for possible use as evidence in the future.
- Such disks will be properly indexed and properly and securely stored in the Main Office safe.
- Any media required by an external source must be approved by the Principal School Leader before release.

### **Breaches of the policy (including breaches of security)**

Any breach of the CCTV Policy by Trust staff will be initially investigated by the Principal School Leader, in order to take the appropriate disciplinary action. Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to appropriately deal with the breach.

### **Assessment of the scheme and code of practice**

Performance monitoring, including random operating checks, may be carried out by the ICT Network Manager under direction of the Principal School Leader.

### **Personnel responsible for implementing the policy**

The Board of Trustees has overall responsibility for the effective operation of this policy, but has delegated day-to-day responsibility for its operation to the Principal School Leader.

Responsibility for monitoring and reviewing the operation of this policy and making recommendations for change to minimise risks also lies with the Senior Leadership Team in liaison with the ICT Network Manager.

All senior school and Trust staff have a specific responsibility for operating within the boundaries of this policy, ensuring that all staff understand the standards of behaviour expected of them and taking action when behaviour falls below its requirements.

***All Trust staff are responsible for the success of this policy and should ensure that they take the time to read and understand it. Any misuse of the CCTV system should be reported to the Principal School Leader in the first instance.***

### **Responsibility for the Policy and Procedure**

#### **Role of the Trust**

- a duty to have in place an overall person responsible for GDPR – Peter Coates

- delegate powers and responsibilities to the Principal School Leader to ensure all school personnel are aware of and comply with this policy

### **Role of the Principal School Leader**

- ensure all school personnel and parents/carers are aware of this policy
- responsibility for ensuring all policies are made available to parents/carers
- monitor the effectiveness of this policy
- annually report to the governing body on the use of this policy
- responsibility for the effective implementation, monitoring and evaluation of this policy

### **Raising Awareness of this Policy**

- in the School Handbook/Prospectus (if the school has one)
- on the school website
- in the Staff Handbook (if the school has one)
- in reports such as Principal School Leader reports to the governing body

### **Training**

Not applicable

### **Equality Impact Assessment**

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this school.

### **Monitoring the Effectiveness of the Policy**

The practical application of this policy will be reviewed annually or when the need arises by the Principal School Leader.

A statement of the policy's effectiveness and any recommendations for improvement will be presented to the governing body for further discussion and endorsement.