



CCTV Policy

Everyone Matters

We expect our community to be polite and respectful

Everyone Helps

We expect our community to make sensible choices

Everyone Succeeds

We expect our community to work hard

Guidance Owner	Acting Vice Principal
Scope of the Policy	Rainford High
Written/last reviewed	February 2021
Next review due	February 2024
Summary of key changes	New policy

Introduction

The use of closed-circuit television (CCTV) in schools and colleges has increased in recent years. While the use of such surveillance is a positive measure to help prevent and reduce fear of crime such as vandalism and enhance site security, CCTV cameras can also cause negative perceptions if this is not fully explained and the rules regarding the use of the data captured are not clear, fair and understood.

Rainford High Technology College (hereafter referred to as the school) has a CCTV system installed as part of its new building. This policy outlines how the CCTV system will be used and managed.

CCTV System Policy Statement

The Board of Trustees of the school is committed to securing the safety and well-being of pupils, staff and visitors to the school premises.

The overriding objective of using CCTV is to enhance a safe environment for pupils, staff and visitors. Additional benefits include protecting the school buildings and assets, prevention of crime and to assist in managing the school. .

The purpose of this Policy is to regulate the management, operation and use of the CCTV system at the school and set out clearly the basis on which the data will be used and shared.

1 Background

- 3.1 This Policy follows the requirements of the General Data Protection Regulation (GDPR) and Data Protection Act 2018.
- 3.2 The Policy will be subject to regular review by the Trustees Finance, Admin and Personnel Committee.
- 3.3 The CCTV system is part of the Private Finance Initiative ("PFI") build and is owned by Interserve, which has ultimate responsibility for its maintenance and use.
- 3.4 The CCTV System is registered with the Information Commissioner under the terms of the GDPR and Data Protection Act 2018 and complies with the requirements of the Information Commissioner's Code of Practice. The registration is maintained by Interserve.
- 3.5 The system comprises a number of fixed and PTZ cameras located around the school site. (PTZ is the security industry term for cameras able to Pan, Tilt and Zoom).
- 3.6 Access to the CCTV recorders and data is restricted. Any additional access will be considered by the Principal strictly on a needs basis.

2 Statement of Intent

- 3.7 The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the legislation.
- 3.8 The system will be used to monitor activities within the school building, grounds and other public areas.
- 3.9 The system will be used for the purpose of ensuring the safety and well-being of pupils, staff and visitors to the school.

- 3.10 The system will also be used to identify criminal or unlawful activity.
- 3.11 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.
- 3.12 Data will not be released to the media or any other person for purposes of entertainment.
- 3.13 Appropriate Warning signs, as required by the Information Commissioner's Code of Practice, will be displayed around the site.

4 Operation of the System

- 4.1 The system will be overseen and managed by the Principal or the Business Manager, as his designated delegate, in accordance with the principles and objectives expressed in this policy.
- 4.2 The day-to-day management will be the responsibility of the Data & Systems Manager during the school day, and the Interserve Facilities Management ("FM") team out of hours and at weekends.
- 4.3 The CCTV system will only be accessible to key holders authorised by the Principal, including the Data & Systems Manager, nominated members of Senior Leadership Team and nominated Interserve FM staff. All staff operating or having access to CCTV will be trained in their responsibilities of data protection issues.
- 4.4 The CCTV system will be operated 24 hours each day, every day of the year. The system will be checked in accordance with the PFI maintenance schedules.
- 4.5 Recorded information will be examined following specific incidents. Requests for viewing these incidents are to be made to the Data & Systems Manager or, in his absence, the Business Manager and can only be made by interested parties at the school having a legitimate reason for so doing. No copies will be made at this point.
- 4.6 Data Storage will conform to the requirements of the Act and the schools retention of records schedule.
- 4.7 Recorded images are temporarily stored securely onto the system server. To allow for electronic storage, images are overwritten automatically and are permanently deleted. The period for storage is dependent upon various factors such as the frames per second recording, amount of cameras on each recorder and the memory capacity of the storage device. Images will not be retained for any longer than is considered necessary.
- 4.8 The Police will be given access to the system and its recordings upon request, by pre-arranged appointment. This is in accordance with Schedule 2 Part 1 of the Data Protection Act 2018 and GDPR Article 6 (1) (d).
- 4.9 If a specific incident may give rise to criminal investigations, litigation or other legal proceedings, then a copy of the data relating to this specific incident can be requested in writing by an interested party. Such request should state the full names and addresses of the persons seeking access to the data and particulars of any organisation with which the data will be shared and explain the purpose for which it will be used. Subject to any overriding legal requirement to provide the data, approval of the request will be at the discretion of the Principal (or his delegate) and will be given in writing. If such approval is not given the reasons shall be given to the person requesting the data in writing. The data provided should only be accessed by

authorised persons. The school will hold a record log of visitors who attend the school to view CCTV.

- 4.10 Where such a data recording is approved and made, it will be provided in hard copy (e.g. CD/DVD). The receiving party must provide a written receipt. A copy of the request, the Principal's authorisation (if appropriate), the receipt and the data provided must be retained by the Business Manager in a sealed envelope suitably annotated and stored securely.
- 4.11 Applications received from the Local Authority, Interserve FM, any other public bodies or legal representatives to view or release any data will be referred to the Principal, who will respond to such requests applying the principles set out above.
- 4.12 Any complaints about the school's CCTV system should be addressed to the Principal and should also be copied to the Chair of Trustees.
- 4.13 Breaches of security of the CCTV system will be investigated by the Principal and dealt with either as a disciplinary matter or a criminal matter as appropriate.
- 4.14 Data may be used within the school's discipline and grievance procedures as required and will be subject to the usual confidential requirements of that process".
- 4.15 Individuals have a right to request access to CCTV footage relating to themselves (Subject Access Request). Requests for such should be made in writing to the Principal.