



## **CCTV POLICY**

### **1 INTRODUCTION**

The King's (The Cathedral) school uses closed circuit television (CCTV) images to monitor the school's buildings in order to provide a safe and secure environment for pupils, staff and visitors, to reduce crime and to prevent loss or damage to school property.

The system comprises a number of fixed cameras.

The system capability records images.

The CCTV system is owned and operated by the school, the deployment of which is determined by the Headteacher, with support from the Premises Manager.

The CCTV is monitored centrally from the Premises office by the Premises Manager.

The introduction of, or changes to CCTV monitoring will be subject to consultation with staff and the school community.

The school's CCTV Scheme is registered with the Information Commissioner's Office under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings is covered by the General Data Protection Regulation 2016 (the GDPR) and the Data Protection Act 2018. This policy outlines the school's use of CCTV and how it complies with the data protection legislation.

All authorised operators, and employees with access to images, are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are trained in their responsibilities under the Information Commissioner's Office [Video surveillance \(including guidance for organisations using CCTV\) | ICO](#). All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

### **2 STATEMENT OF INTENT**

The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice, to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:

[Video surveillance \(including guidance for organisations using CCTV\) | ICO](#)

All authorised operators will sign to agree they have understood this policy on an annual basis and/or when changes are made to this policy.

CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including school gates, where coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV. In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

The planning and design of the camera placement is intended to ensure that the CCTV 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.

CCTV surveillance at the schools is intended for the purposes of:

- Protecting the school buildings and assets, both during and after school hours;
- Promoting the health and safety of staff, pupils and visitors;
- Preventing bullying;
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
- Supporting the police in a bid to deter and detect crime;
- Assisting in identifying, apprehending and prosecuting offenders;
- Ensuring that the school rules are respected, so that the school can be properly managed.

### **3 SITING THE CAMERAS**

Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the GDPR and the Data Protection Act 2018.

The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

CCTV will not generally be used in classrooms, but in areas within the school that have been identified as not being easily monitored. If, CCTV is placed in classrooms, a Risk Assessment will be completed and staff provided details of the location/s.

Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

### **4 COVERT MONITORING**

The school may in exceptional circumstances set up covert monitoring, for example:

- Where there is good cause to suspect that an illegal or 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.

In these circumstances authorisation must be obtained, in advance, by the Headteacher, Chair of Governors and the Data Protection Officer.

Covert monitoring must cease following completion of an investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles.

### **5 STORAGE AND RETENTION OF CCTV IMAGES**

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

Only the Headteacher (or those authorised by the Headteacher) will be permitted to download, store and/or retain CCTV images.

All retained data will be stored securely, by the ICT department on the server.

## **6 ACCESS TO CCTV IMAGES**

Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available unless responding to a formal SAR, and under the guidance of the DPO, which should be sought in advance.

## **7 SUBJECT ACCESS REQUESTS (SAR)**

Individuals have the right to request access to CCTV footage relating to themselves under the GDPR and the Data Protection Act 2018.

All requests should be made to the Headteacher, ideally in writing. 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.

The Headteacher must contact the Data Protection Officer promptly for advice, prior to releasing any footage.

The school will respond to requests within 1 month of receipt. Schools are advised to investigate and respond promptly to avoid the footage being overwritten.

Under data protection legislation, a fee is not normally charged, although a reasonable fee based on the administrative cost of providing the data can be charged when a request is manifestly unfounded or excessive, particularly if it is repetitive.

The school reserves the right to refuse access to CCTV images and sound footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

## **8 ACCESS TO AND DISCLOSURE OF IMAGES TO THIRD PARTIES**

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the police, and service providers to the school, where these would reasonably need access to the data (e.g. investigators). These will be actioned once a formal request has been submitted and guidance from the Data Protection Officer has been sought.

Any parent requests should be made to the Headteacher and treated as a Subject Access Request. Parents can view the footage, but only if no other student(s)'s images are on view. Redacted screen prints should be considered as an alternative.

Any access by staff should comply with the following: live footage should only be seen by staff managing or monitoring the system/cameras, with the delegated authority of the Headteacher. Recording systems must be located in areas of reduced access, to avoid potential tampering.

The data may be used within the school's Discipline and Grievance Procedures, as required, and will be subject to the usual confidentiality requirements of those procedures.

## **9 COMPLAINTS**

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance, who will consult with the Data Protection Officer, and act in accordance with the school's Complaints Policy and Procedures.

## 10 FURTHER INFORMATION

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition 2021 (published by the Information Commissioners Office): [Surveillance Camera Code of Practice \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/94414/cctv-code-of-practice-revised-edition-2021.pdf)
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018
- General Data Protection Regulation 2016 (GDPR)

## **CCTV MANAGEMENT and OPERATION PROCEDURE**

The Scheme will be administered and managed by the Premises Manager.

The CCTV system will be operated 24 hours each day of the year.

### **Control Equipment**

The Premises Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is recording properly and that cameras are fully functional.

Access to the CCTV system will be strictly limited to the Premises Manager, ICT Network Manager. Premises Officers and ICT Technicians may also access the system under direction from the Premises Manager and ICT Network Manager and in their absence if required to do so. Specified access to images can be given to individual(s) by the Headteacher.

Contractors wishing to access the CCTV system will be subject to particular arrangements as outlined below.

Staff authorised to access CCTV system must satisfy themselves over the identity of any other contractors/visitor to the area of the CCTV system and the purpose of the visit. Where any doubt exists, access will be refused.

### **Monitoring Procedures**

Camera surveillance will be maintained at all times.

The Premises Manager and the ICT Network Manager have remote access to the CCTV system via a Virtual Private Network (VPN) connection.

### **Procedures**

In order to maintain and preserve the integrity of the CDs used to transfer images/recordings from the hard drive and the facility, and to use them in any future proceedings, the following procedures for their use and retention will be strictly adhered to:

- a) Each CD will be identified by a unique mark.
- b) Each CD will be brand new and unused.
- c) The authorised member of staff (Premises Manager or ICT Network Manager) will record the date and time that the copy was made. A register will be available for this purpose and will be maintained in the Premises Office.
- d) A CD required for evidential purposes will be sealed, witnessed, signed by the authorised member of staff, dated and stored in a separate, secure, evidence store.
- e) If the CD is archived the reference will be noted.
- f) Images may be viewed by the Police, in the presence of the Premises Manager or ICT Network Manager, for the prevention and detection of crime. A record of such viewings will be kept.
- g) A record will be maintained of the release of recorded images to the Police or other authorised applicants. A register will be available for this purpose and will be maintained in the Premises Office.
- h) Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.

- i) Should a CD be required as evidence, a copy may be released to the Police under the procedures described above. CDs will only be released to the Police on the clear understanding that they remain the property of the School, and both the CD 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 CD or any part of the information contained thereon. On occasions when a Court requires the release of an original CD this will be produced from the secure evidence store, complete in its sealed bag.

- j) Should the Police require the school to retain the stored CD for possible use as evidence in the future such CDs will be properly indexed and securely stored until they are needed by the Police.
- k) Applications received from outside bodies (e.g. solicitors) to view or release CD will be referred to the Headteacher. In these circumstances, CDs 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. A fee can be charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

### **CCTV CAMERA LOCATIONS**

1. Sixth Form Café (Internal)
2. Sixth Form Common Room (Internal)
3. Sixth Form Common Room (Internal)
4. Sixth Form Common Room (Internal)
5. Room 50 ICT (Internal)
6. Room 50 ICT (Internal)
7. Room 150 ICT (Internal)
8. Room 150 ICT (Internal)
9. Fitness Suite (Internal)
10. Fitness Suite (Internal)
11. Sports Hall Entrance (Sports Hall Building Wall) (External)
12. Goods Inwards Entrance (Sixth Form Building Wall) (External)
13. Reception Entrance (Victorian Building Wall) (External)
14. Sixth Form Quad (Main Hall Building Wall) (External)
15. Sixth Form Café Rear Door (Sixth Form Building Wall) (External)
16. Science Car Park Entrance (Science Building Wall) (External)
17. Tech Car Park (Drama Building Wall) (External)
18. Drama Car Park (Drama Building Wall) (External)
19. Learning Support / Drama Entrance (Technology Building Wall) (External)
20. Humanities Quad (Science Building Wall) (External)
21. Victorian Block Car Park (Library Building Wall) (External)
22. Dining Room / Main Foyer Entrance (Dining Hall Wall) (External)
23. Sixth Form Quad (Victorian Building Wall) (External)
24. Maths Quad (Hall Building Wall) (External)
25. Humanities Bridge (Humanities Building Wall) (External)
26. The Orrery (Humanities Building Wall) (External)
27. Tech Quad (Technology Building Wall) (External)
28. Maths Entrance (Technology Building Wall) (External)
29. Madeley Front Entrance (External)
30. Madeley Side Entrance (External)
31. Madeley Play Area (External)
32. Madeley Car Park (External)

33. Madeley Back Gate (External)
34. Madeley Princes Street Entrance (External)
35. Maths / Hall Passageway (Exams Office Wall) (External)
36. Art Room 61 (Internal)
37. Hard Play Area (Drama Building Wall) (External)
38. Main Corridor outside Boys' Toilets (Internal)
39. Main Corridor outside Girls' Toilets (Internal)
40. Huntly Grove Pedestrian Gate (Humanities Building Wall) (External)
41. Granville Street Pedestrian Gate (Drama Building Wall) (External)
42. Sports Hall Corridor (Internal)
43. Sports Hall Corridor (Internal)
44. Main Corridor (Adjacent to Dining Room Entrance) (Internal)
45. Library Wolfson Room (Internal)
46. ICT Room 183 (Internal)
47. Art Room 53 (Internal)
48. Biology ICT (Internal)
49. Faraday ICT (Internal)
50. Dining Room Left (Internal)
51. Dining Room Right (Internal)
52. Music M1 (Internal)
53. Music Side Entrance Foyer (Internal)
54. Junior Department Entrance (Internal)
55. Main Entrance Foyer (Internal)
56. School Hall (Internal)
57. Humanities Upstairs Corridor (Adjacent to Room 193) (Internal)
58. Humanities Downstairs Corridor (Adjacent to Room 93) (Internal)
59. Park Road Small Gate (Science Building Wall) (External)
60. Science Emergency Exit (Science Building Wall) (External)
61. Table Tennis Play Area (Humanities Building Wall) (External)
62. Technology Block Foyer (Internal)
63. Art Corridor (Internal)
64. DT Room 81 (Internal)
65. Science Upstairs Corridor (Internal)
66. Music M3 (Internal)
67. Music M4 (Internal)
68. Learning Support / Drama Foyer (Internal)
69. Sixth Form Upstairs Corridor - Centre (Internal)
70. Sixth Form Upstairs Corridor - End (Internal)
71. Sixth Form Downstairs Corridor - Centre (Internal)
72. Sixth Form Downstairs Corridor - End (Internal)
73. Finance Foyer (Internal)
74. Front Reception (Internal)
75. English Corridor (Tower Foyer) (Internal)
76. English Upstairs Corridor (Internal)
77. UCAS Corridor (Internal)
78. Main Corridor - Science End (Internal)
79. Library (Internal)
80. Music Storeroom (Internal)
81. Music Stageroom (Internal)
82. Behaviour Support (Internal)
83. Humanities Locker Shelter (Humanities Building Wall) (External)
84. Tech Quad Locker Shelter (Technology Building Wall) (External)
85. Science Entrance Locker Shelter (Science Building Wall) (External)