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CCTV Policy

Policy Adoption

Date	Reviewed/Adopted by	Next review date	Review Frequency
01/04/2024	Senior Leadership Team	Summer Term 2027	Three yearly

Senior Leadership Team Approval

Signed	Title
	Headteacher

Document Control

Date	Version	Author	Notes
01/10/2014	1.00	S Ewing	New Policy
15/05/2018	2.00	P Leake	Updated format Updated to reference GDPR and Data Protection Bill 2018 Updated Appendix 1 approved staff Added contents page
06/06/2018	2.10	P Leake	Updated references to Data Protection Act 2018 Replaced references to Assets and Premises Manager with Head of Operations
11/08/2018	2.20	P Leake	Replaced header as badge/phone numbers have changed. Changed PLE Job title to Head of Operations.
22/09/2018	2.30	P Leake	Accepted amendments proposed by DPO, incorporated changes of CCTV Policy from DPO
23/11/2019	2.40	P Leake	Approval changed to Senior Leadership Team Annual review by DPO S1 Purpose – Point 2 amended S4 Covert Monitoring – added S5 Amendment to retention of CCTV images S8 Addition of 8.2
09/05/2020	2.50	P Leake	Ammended Appedix 1 to reflect staffing changes
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Introduction

The Purpose of this policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at Barking Abbey School, hereafter referred to as 'the school'.

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 in the external environs of the premises during both the daylight and night hours each day. CCTV surveillance at the School 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 as well as for monitoring student behaviour;
- 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; and
- ensuring that the school rules are respected so that the school can be properly managed.

The system does not have sound recording capability.

The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.

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

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 (GDPR) 2016/679.

All authorised operators and employees with access to images are aware of the procedures 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.

Policy Statement

- If printed, copied or otherwise transferred from this website this document must be considered to be an uncontrolled copy.
- Policy amendments may occur at any time and you should consult the Policies page on the website for the latest update.

Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use.

The Code of Practice is published at: <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

CCTV warning signs will be clearly and prominently placed at the main external entrance to the school. Signs will contain details of the purpose for using CCTV (see Appendix A). In areas where CCTV is used, the school will ensure that there are prominent signs placed within the controlled area.

The planning and design have endeavoured to ensure that the system will give maximum effectiveness and efficiency, but it is not guaranteed that the system will cover or detect every single incident taking place in the areas of coverage.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including Equality & Diversity Policy, Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other educational and related legislation.

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.

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.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school or a student attending the school.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the school. Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulations and Data Protection Act 2018

1 Legislation

Legislation applicable to the closed-circuit television policy includes:

- Data Protection Act 2018
- General Data Protection Regulations
- Human Rights Act 1998
- The Health & Safety at Work Act 1974
- The Regulation of Investigatory Powers Act 2000
- The Private Security Industry Act 2001

2 Responsibilities

Individual accountabilities for the implementation of this document are as follows:

2.1 Headteacher

The Head teacher is accountable for the security measures in place within the School. These measures exercise this accountability by ensuring compliance with the Data Protection Act 2018 with reference to the operation, use of CCTV equipment, recording and viewing of images.

The Head teacher is responsible for ensuring that the monitoring of the Schools CCTV system is conducted for all applicable locations, and in compliance with legislation and School policies.

The Headteacher 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 the school.
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy.
- Ensure that the CCTV monitoring 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 (e.g. an access log) to or the release of tapes or any material recorded or stored in the system.

- Ensure that monitoring recorded tapes are not duplicated for release.
- 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.
- Ensure that external cameras 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 tapes are stored in a secure place with access by authorised personnel only
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 31 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Headteacher.
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy.
- 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.

2.2 Head of Operations

The Head of Operations is accountable to the Head teacher. The duties of this post holder in respect of the CCTV system are to:

- Ensure that the installation and operation of the CCTV system complies with the CCTV Code of Practice issued by the Information Commissioner’s office (ICO).
- Ensure that the system is maintained and repaired when necessary
- Review the system configuration, quantity of cameras and capacity of storage, its suitability to provide the information that may be needed and the validity in line with ICO guidelines to ensure conformance.
- Deal with any complaints regarding the operation of the CCTV system to ensure that they are dealt with under the terms of the Schools internal complaints procedure.
- Retain images for evidential purposes and ensure they are kept in a secure place to which access is controlled.
- Ensure the notification lodged with the ICO covers the purpose for which this equipment is used.

3 Location of Cameras

The cameras are sited so that they only capture images relevant to the purposes for which they have been installed (as 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 the images captured comply with the legislation.

The school will make every effort to position the cameras so that their coverage is restricted to the school premises, which includes both indoor and outdoor areas.

CCTV will not be used in classrooms but in limited areas within the school that have been identified by staff and pupils as not being easily monitored.

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

CCTV Video Monitoring and Recording of Public Areas may include the following:

- **Protection of school buildings and property:** The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services
- **Monitoring of Access Control Systems:** Monitor and record restricted access areas at entrances to buildings and other areas
- **Verification of Security Alarms:** Intrusion alarms, exit door controls, external alarms
- **Video Patrol of Public Areas:** Parking areas, Main entrance/exit gates, Traffic Control
- **Criminal Investigations (carried out by the police):** Robbery, burglary and theft surveillance

4 Covert Monitoring

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.

In these circumstances, authorisation must be obtained beforehand from the Headteacher and Chair of Governors.

Covert Monitoring may take place in classrooms when circumstances as above are satisfied. Covert Monitoring used in classrooms will never be used to observe or assess a teacher's professional performance, or to contribute to capability proceedings.

Covert Monitoring will 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, toilets.

5 Storage and Retention

Recorded data will not be retained for longer than 31 days except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

Where data is retained for longer than 31 days an electronic file 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.

The School will store data securely at all times.

6 Access to CCTV Images

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 other staff members (Appendix 1). When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

7 Subject Access Requests (SAR)

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

- 7.2 All requests should be made in writing to the Data Protection Officer who can be contacted by email to dpo@barkingabbeysschool.co.uk Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location.
- 7.3 The school does not have a facility to provide copies of CCTV footage but instead the applicant may view the CCTV footage if available.
- 7.4 The school will respond to requests within 30 days of receiving the request but if a request is received outside of the school term this may not be possible.
- 7.5 The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

8 Access and Disclosure of Images to Third Parties

- 8.1 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).
- 8.2 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.
- 8.3 Requests for images should be made in writing to the Data Protection Officer.
- 8.4 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 CCTV Signage

Signs will be placed so that staff, students and the public are aware that they are entering a zone which is covered by surveillance equipment.

- The signs should be clearly visible and legible to staff, learners and members of the public.
- The size of the signs will vary in accordance with circumstances:
 - For example – a sign on the entrance door may only need to be A4 because it is at eye level of those entering the premises.
 - For example – signs at the entrances of car parks alerting drivers to the fact the car park is covered by such equipment will usually need to be large, probably A3 size as they are likely to be viewed from further away e.g. a driver sitting in a car.

The signs will contain the following information:

- Identity of Barking Abbey School as the organisation responsible for the scheme
- The purpose of the scheme
- Details of whom to contact regarding the scheme

For example – Where an image of a camera is not being used on a sign - the following words should be used:

“Images are being monitored for the purpose of crime prevention and public safety. This scheme is controlled by Barking Abbey School for further information contact 020 3967 7030”

For Example – Where an image of a camera is used on a sign the following wording should be used:

“This scheme is controlled by Barking Abbey School for further information contact 020 3967 7030.”

Example Sign



10 Control Room

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

Access to CCTV Cameras will be strictly limited to those listed in Appendix 1. Visitors and other contractors wishing to enter an area where visibility of CCTV images is available will be subject to particular arrangement as outlined below.

The system may generate a certain amount of interest. It is vital that operations are managed with the minimum of disruption. Casual visits will not be permitted. Visitors are to obtain permission from the Head of Operations or nominated deputy and must be accompanied throughout the visit.

Any visit may be immediately curtailed if prevailing operational requirements make this necessary.

If out of hours emergency maintenance arises, the operators must be satisfied of the identity and purpose of contractors before allowing entry.

A visitor's book will be maintained in the caretaker's room. Full details of visitors including time/date of entry and exit will be recorded.

During the working day when not staffed, the room must be kept secured.

11 System Review

The school will undertake a system review at least every two years to ensure compliance with the ICO and that the system continues to be deemed reasonable in its size, configuration and purpose. This process may be carried out with the assistance of an external professional body.

12 Policy Review

The Data Protection Officer is responsible for monitoring and reviewing this policy. This policy will be reviewed annually. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

Appendix 1

Authorised Staff

Full Access

Name	Job Title
Tony Roe	Executive Headteacher
Claire Keefe	School Business Manager
Paul Leake	Head of Operations
Farhan Khan	Network and Infrastructure Manager

Live View

Cleantec operatives named below as part of their duty to ensure the site is safe and secure, specifically during lettings and weekends.

Name	Job Title / Company
Khaled Miah	School Keeper
Harry Chant	School Keeper
Ian Manhood	School Keeper
Tony Manhood	School Keeper
Sarfo Boake-Ansah	School Keeper
Carlos Ntete	School Keeper
David Cooper	School Keeper

Review of recorded images in the event of evidence gathering

Name	Job Title
Peter Flaxman	Executive Deputy Headteacher
Stephanie Gibson	Senior Deputy Headteacher / Head of Campuses
Kat Watkins	Assistant Headteacher - LR
Daniel Robinson	Assistant Headteacher - SR
Alex Brooks	Head of Year – LR
Jeremy Wilson	Head of Year – LR
Andrea Agathangelou	Head of Year – LR
Roxana Stylianou	Head of Year – LR
Sean Webb	Head of Year – LR
Jo Plaster	Pastoral Co-ordinator - LR
Emma Williams	Pastoral Co-ordinator - LR
Leroy Jack	Pastoral Co-ordinator - LR
Ashleigh Willer	Head of Year – SR
Craig Wynter	Head of Year – SR
Tom Cope	Head of Year – SR
Kiran Wharnsby	Head of Year – SR
Scott Leather	Head of Year – SR
Linda Jennings	Pastoral Co-ordinator - SR
Darryl Greaves	Pastoral Co-ordinator - SR
Liga Luvuezo	Pastoral Co-ordinator - SR

Delegated authority to carry out recorded image searches **if requested** by senior staff listed above

Name	Job Title
Sam McLeod	Senior ICT Technician
Ismail Moughal	Senior ICT Technician
Derek Ashong	ICT Technician

Appendix 2



CCTV OPERATIONS SYSTEM DATA PROTECTION ACT 2018

REQUEST FROM POLICE OR OTHER GOVERNMENT AGENCY FOR DATA HELD ON CCTV

Date & Time of Incident:	
Details of Incident	
Signature of Police Officer/Government Agency:	
Printed Name of Police Officer/Government Agency:	
Shoulder/Badge No:	
Incident Report Number:	Date Information Taken:
Approved by:	Signature: