

Aylesford School

and Sixth Form College



wonder aspiration respect discipline

CCTV POLICY

Written/updated: April 2019
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Lead: Business Manager
Via: Finance and Premises

'from potential to reality'

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1.0 Introduction

The purpose of this policy is to regulate the management, operation and use of the CCTV system at Aylesford School and Sixth form College.

Objectives of the CCTV System:-

- To provide a safe and secure environment for its students, staff and visitors.
- To monitor and protect the school buildings and their assets.
- To support the police to deter and detect criminal activity.
- To assist in identifying, apprehending and prosecuting offenders.
- To assist in managing the behaviour of students in school.

2.0 General Data Protection Regulations (GDPR) and ICO Codes of Practice

Aylesford School and Sixth form College has chosen to use CCTV in various areas across the school, including external areas surrounding all buildings and car parks.

GDPR, Regulation of Investigatory Powers Act (2000) and CCTV Code of Practice (issued by the ICO) explain how CCTV systems should be used so that users can enjoy security and safety whilst ensuring that individual rights are upheld.

Aylesford School and Sixth form College adopts good standards of practice, which support compliance with the aforementioned regulations and codes of practice.

Failure to comply with the relevant regulations or codes of practice would cause the school to be in breach of the law, render any evidence as inadmissible and potentially carry penalties for the school, as a CCTV user or individual members of staff.

3.0 Authorised Users

The following authorised members of staff have been provided with the necessary instruction in the use of the system and they are the only staff permitted access to recordings made by the system:

Business Manager

Senior ICT Technicians

Deputy Headteacher

Assistant Headteachers

The school has undertaken the following checklist to ensure the CCTV system is operated within the Law and that images can be used for crime prevention.

- The school has specified that the CCTV cameras have been installed for the safeguarding of staff and students, for the detection and prevention of crime/vandalism across the estate.
- Signage is found in prominent positions in all areas where CCTV cameras operate, to inform site users that they are entering an area where their images are being recorded.
- The school retains the right to be the data controller for all recorded images through the use of its CCTV system.
- The equipment is sited so that it only monitors those spaces that are intended to be covered by the equipment.

- All CCTV system operators are aware of the purpose for which the scheme has been established.
- Operators are aware they are only able to use the system in order to achieve the objectives for which it has been installed. i.e. safeguarding and the prevention of crime.
- Recorded images are stored on NVRs (Network Video Recorders) for a maximum period of 30 days before being automatically deleted.

4.0 Code of Practice

- This CCTV Policy will be reviewed every year or following any significant changes to the system or the law.
- The CCTV system is owned and operated by the school.
- The recorded images may only be viewed by authorised members of staff (listed above).
- Recorded images required as evidence will be downloaded from the relevant NVR and stored securely. Where such recorded images are requested by law enforcement agencies, a record will be maintained.

5.0 Breaches of the Code

- Any breach of the Code of Practice by the school will be initially investigated by the Headteacher, in order for them 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 remedy the breach.

In order to comply with GDPR legislation and CCTV code of practice the school will adhere to the following “dos and don’ts” in the management of its CCTV system:

The school will:-

- Ensure CCTV is the only viable option to achieve the stated purpose.
- Formally assess the appropriateness of, and reasons for, using CCTV.
- Consult the relevant parties involved.
- Undertake regular reviews of both the use of the CCTV system and the procedures to ensure compliance with the law.
- Ensure that recorded images are not kept for longer than necessary – at the moment the data retention is for a maximum of 30 days.
- Process (working with, using, passing on data) images in a lawful manner.

At the point of obtaining images provide:-

- The identity of the data controller (name and address of school).
- The identity of the representative the data controller has nominated for the purposes of the Act.
- The purpose or purposes for which the images are intended to be used; and any information which is necessary, having regard to the specific circumstances in which the images are, or are to be, processed to enable processing in respect of the individual to be fair.
- Establish and document the person(s) who are responsible for ensuring day-to-day compliance with the requirement of the Code of Practice.
- Make certain there are procedures for dealing with police enquiries, i.e. access under GDPR or removal of evidence under Police and Criminal Evidence Act.

- Ensure that the location of CCTV cameras will not amount to an infringement of personal privacy.

The school will not:-

- Use CCTV footage for any other purpose other than what it was originally used for e.g. Prevention and detection of a crime.
- Use covert (i.e. where it is calculated to ensure that the persons are unaware) monitoring without seeking legal advice.
- Use inadequate equipment. Blurred or indistinct images could constitute as inadequate data, whilst poorly maintained equipment may not provide legally sound evidence.
- Disclose data to third parties, unless it is lawful to do so.
- Systematically monitor people by use of CCTV.
- Ignore subject access requests (an individual's written request to access information about themselves under the Data Protection Act). A person identifiable on CCTV images may be entitled to view the footage and may make a request to do so.
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6.0 Checklist

This CCTV system and the images produced by it are controlled by Aylesford School and Sixth form College who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998).

Aylesford School and Sixth form College has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of customers. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

Aylesford School and Sixth Form College in fulfilling its obligations as detailed in the policy above will conduct regular audit/reviews of our use of CCTV as detail in the checklist below:-

	Checked (Date if appropriate)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Yes Nov 2018	Sue Grinnell Anna Timson	November 2019
There is a named individual who is responsible for the operation of the system.	Yes	Sue Grinnell Laurence Pavier	April 2020
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	Yes	Sue Grinnell Laurence Pavier	April 2020
Staff and members of the school community will be consulted about any proposal to install / amend CCTV equipment or its use as appropriate.	Yes	Head Teacher	April 2020
Cameras have been sited so that they provide clear images.	Yes	Sue Grinnell Laurence Pavier	April 2020
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Yes	Sue Grinnell Laurence Pavier	April 2020
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	Yes	Sue Grinnell Laurence Pavier	April 2020
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes	Laurence Pavier	April 2020
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.	Yes	Sue Grinnell Laurence Pavier	April 2020
Except for law enforcement bodies, images will not be provided to third parties.	Yes	Sue Grinnell Laurence Pavier	April 2020
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the data controller knows to seek advice from the Information Commissioner as soon as such a request is made.	Yes	Sue Grinnell Anna Timson	April 2020
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes	Sue Grinnell Laurence Pavier	April 2020