

THE TELFORD PRIORY SCHOOL



Member of Leadership Team with Responsibility for Update of Policy	Stacey Jordan
Headteacher	Stacey Jordan
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CCTV Usage Policy

The Telford Priory School CCTV Usage Policy

This policy has been drawn up to govern the use of CCTV in the school environment and those involved in the operation and installation of the schools CCTV system. The policy is written in sympathy with guidelines published by the Home Office and the Information Commissioners Office (ICO) 2008 on the use of CCTV in public places, as well as making reference to Telford & Wrekin Council guidelines for schools in the county.

In developing the policy the school has also considered the local authorities 'CCTV Checklist' to ensure all CCTV implications have been considered.

The System

The CCTV Camera positions have been carefully located to ensure they are appropriate and effective whilst minimizing any collateral intrusion. It is impossible, however, to ensure that every incident will be seen or recorded. The CCTV system will be maintained in accordance with the Data Commissioners CCTV code of practice guidelines (2008) and this policy.

Maintenance checks

- Cameras will be checked once a day to ensure that they are operational by the ICT Manager
- Recorders will be checked once a week to ensure that they are recording and it is possible to download images by the ICT Manager
- Camera fixings will be checked to ensure safety and security, during planned maintenance e.g. cleaning cameras by the Facilities Manager
- Repairs will be made to the system within two weeks if practical, dependent upon cost and CCTV review
- Technical issues will be reported to the ICT Manager immediately following checks in the event of cameras or recorders being in-operational
- Firmware for the recorders will be checked on a biannual basis and updated as needed.

Camera images will be recorded and displayed on a CCTV monitor in the Operational Business Manager and ICT Managers offices. The recording media is an electronic recorder – the images are stored on a hard drive, which is automatically overwritten after a period of 30 days.

Third Party Access

Due to our local arrangement with Oakengates Leisure Centre regarding the 3G pitches and access to the facilities via the car park, they have viewing access to 4 cameras to monitor these areas for security purposes. They have their own login to the system which restricts access to the following cameras: 3G Pitch, 3G School Side, Car Park, and Car Park Gate.

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Purpose of CCTV

The system is intended to provide and promote a safe secure environment for pupils and for those who work or use the facilities of the school; and to protect the school buildings and resources. It is hoped that it will also reduce the fear of crime and anti-social behaviour within the location. The system is intended to view and monitor activity in the immediate area of the school ONLY.

It shall be used for the purpose of:

- Preventing and deterring crime & antisocial behaviour;
- Student, staff and public safety, and;
- Assisting responsible agencies in the investigation of crime & antisocial behaviour

It will achieve this by:

- Providing evidential quality images of criminal incidents and suspects, and;
- Assisting the responsible authorities in the investigation of crime & disorder

Data Protection

The system shall be used in accordance to all relevant laws and guidelines, including the General Data Protection Regulation (GDPR), The Human Rights Act 1998 and if appropriate Regulation of Investigatory Powers Act 2000.

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Signage

Signs are displayed at entrance points and within the area covered by the system to inform staff, students and the public.

Management of the system

The overall management of the system is the responsibility of the Governing Body who have delegated the responsibility to the Headteacher, ICT Manager and the Operations Business Manager.

Management and operation of control equipment

The system will be managed in accordance with all relevant legislation.

Access and Security

The day-to-day management and security of the control equipment and data is the responsibility of the Facilities Manager who will follow the GDPR guidelines with regard to access.

Incident Reporting and Response

The reporting of incidents will initially be via email. The footage will be recorded onto the authorised users one-drive and then shared with the requested via secure link.

A record of the recording is logged in the CCTV Log held on the Site and Facilities MS Teams. During monitoring, if criminal or suspicious activity of a serious nature is observed, then the school will immediately inform the Police. Once an incident is reported to the Police it will be dealt with in accordance with Police procedure. All other incidents will be logged and dealt with by the relevant authorities. Only authorised staff will have access to the system and the downloaded images.

Storage of Recorded Images and their viewing

The storage space shall be dust and moisture proof

Viewing or copying will be carried out only if it would assist the school in supporting procedures for which the Headteacher is responsible or to address one of the issues stated in the 'purpose of CCTV'

- Recorded images are not to be taken away from the school premises under any circumstances unless by authorised persons, for example the Police.
- Recorded images are shared only with staff who need to see the footage to carry out an investigation of the incident. The footage is shared electronically, and not placed on any removal hardware devices.

The register of incidents and reviews

The register will include the following:

- When searching or reviewing an incident the purpose of doing so should be recorded. Also note if the search was successful or not
- Who carried out the search and/or copied the event
- Persons present (particularly when reviewing)
- Date, start and end time of the incident
- Date and time of the review/copy
- Details of who any recorded footage has been shared with, and/or the officer or authorised agent collecting the copied media and their contact details
- Date of collection along with a signature and name in block capitals, including agency

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- On occasion where the request relates to an on-going incident or investigation any appropriate reference numbers should also be included

Access to recorded information

GDPR provides Data Subjects (individuals to whom “personal data relates”) with a right to have access to CCTV images relating to them. People can make a request to view their footage by making a Subject Access Request in writing or verbally to the school. Where Subject Access Requests are made on behalf of a data subject, a written signed consent will be required from the subject before the access to the footage is provided. Students and/or their parents can make a request to view relevant footage by making a prior appointment primarily through Deputy Head (Pastoral), however, requests via other staff members will be considered.

Applications received from outside bodies (e.g., solicitors or Courts) to view or release recorded data will be referred to the Headteacher who will seek legal advice if necessary. In these circumstances recordings will only be released where satisfactory documentation is produced to support the request.

A ‘reasonable fee’, which is currently set at £10 for the administrative costs of complying with a request if it is manifestly unfounded or excessive, or if an individual requests further copies of their data.

Staff training

- The Headteacher shall have responsibility to ensure that all appropriate staff are trained on the use of the equipment and are familiar with their data protection responsibilities as detailed in the ICO’s CCTV code of practice 2008

Complaints

- Any complaints about the schools CCTV system should be addressed to the Headteacher
- Complaints will be investigated in accordance with this Policy

Breaches of policy

- Misuse of recorded imagery or the system will be a disciplinary offence
- Any breaches of the policy by school staff will be individually investigated by the Headteacher, and appropriate disciplinary action taken
- Disciplinary action may also include prosecution under the Data Protection Act and criminal proceedings may follow