

# Gladesmore Community School



## CCTV Policy

**[OP17]**

Last updated : 18 May 2023		Next review : 3 years	
Governing Body :			
Status : Guidance	Index : Operational		Website : N

# CCTV Policy

## 1. PURPOSE

The Purpose of this policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) CCTV systems are installed 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 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. Employees are aware of the restrictions in relation to access to, and disclosure of recorded images.

## 2. 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.

CCTV warning signs will be placed at the main entrance to the school and will ensure that there are prominent signs placed within the buildings to notify users.

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 and related legislation. 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.

Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulation and Data Protection Act 2018

### 3. LOCATION OF CAMERAS

The CCTV system used by the school comprises of:

CAMERA TYPE	LOCATION	SOUND	RECORDING CAPACITY	SWIVEL / FIXED
Turret	Success Lounge - Gladesmore Road vehicle entrance	No	Yes	Fixed
Turret	Success Lounge - Pathway of external building	No	Yes	Fixed
Turret	Success Lounge - Pathway of external building 2	No	Yes	Fixed
Turret	Success Lounge – Gladesmore Road pupil entrance gate	No	Yes	Fixed
Turret	Success Lounge – Gladesmore Road staff entrance gate	No	Yes	Fixed
Turret	Success Lounge – Bin storage area	No	Yes	Fixed
Dome	Success Lounge – Internal building entrance	No	Yes	Fixed
Dome	Success Lounge – Building entrance	No	Yes	Fixed
Dome	Maths & Science Block – Pupil toilet and auditorium entrance	No	Yes	Fixed
Bullet	Maths & Science Block – Pupil toilet and auditorium entrance 2	No	Yes	Fixed
Dome	Maths & Science Block – Foyer 1	No	Yes	Fixed
Dome	Maths & Science Block – Foyer 2	No	Yes	Fixed
Dome	Science Block – Lower staircase	No	Yes	Fixed
Dome	Science Block – Upper staircase	No	Yes	Fixed

Dome	Maths & Science Block – Upper floor walkway	No	Yes	Fixed
Dome	Maths Block – Upper corridor	No	Yes	Fixed
Dome	Maths Block – Lower corridor	No	Yes	Fixed
Bullet	Maths Block – Outside canopy	No	Yes	Fixed
Bullet	Maths Block – Astro turf pitch and grass area	No	Yes	Fixed
Turret	Science Block – External staircase	No	Yes	Fixed
Bullet	Science Block – Gladesmore service gate entrance	No	Yes	Fixed
Bullet	Science Block – Playground	No	Yes	Fixed
Turret	K Block overlooking playground	No	Yes	Fixed
Turret	K Block overlooking playground 2	No	Yes	Fixed
Dome	Main building – 1 <sup>st</sup> floor English corridor	No	Yes	Fixed
Dome	Main building – 1 <sup>st</sup> floor Languages corridor	No	Yes	Fixed
Dome	Main building – 2nd floor Drama and Music corridor	No	Yes	Fixed
Dome	Main building – 2nd floor Humanities corridor	No	Yes	Fixed
Dome	Main building – 2nd floor outside A12	No	Yes	Fixed
Dome	Main building – 2nd floor Humanities storeroom entrance	No	Yes	Fixed
Dome	Main building – 3rd floor outside IT12	No	Yes	Fixed
Dome	Main building – 3rd floor outside IT4	No	Yes	Fixed
Bullet	Rear car park automatic gates 1	No	Yes	Fixed
Turret	Rear car park automatic gates 2	No	Yes	Fixed
Bullet	Main building car park 1	No	Yes	Fixed
Bullet	Main building car park 2	No	Yes	Fixed
Turret	CLC Building Crowland Road	No	Yes	Fixed
Dome	Main Building staircase	No	Yes	Fixed
Bullet	Playground Crowland/CLC	No	Yes	Fixed
Bullet	Gladesmore Road car park entrance	No	Yes	Fixed
Bullet	Gladesmore Road outside CLC building	No	Yes	Fixed
Turret	Main school entrance gate 1	No	Yes	Fixed

Turret	Main school entrance gate 2	No	Yes	Fixed
Turret	Main school entrance entry gate	No	Yes	Fixed
Bullet	Main school entrance gate security hut	No	Yes	Fixed
Bullet	Markfield Park pathway	No	Yes	Fixed
Bullet	Main building car park Food Tech	No	Yes	Fixed
Dome	CLC building external staircase	No	Yes	Fixed
Dome	CLC building external pathway	No	Yes	Fixed
Turret	Main building communal area & bike shed	No	Yes	Fixed
Dome	Main building reception foyer	No	Yes	Fixed
Dome	Main building ground floor corridor	No	Yes	Fixed
Dome	CLC building room C05 1	No	Yes	Fixed
Dome	CLC building room C05 2	No	Yes	Fixed
Bullet	Main building external site manager office	No	Yes	Fixed
Turret	Main building canteen	No	Yes	Fixed
Turret	Main building assembly hall	No	Yes	Fixed
Dome	Main building reception visitors' area	No	Yes	Fixed
Dome	Sports Centre car park staff entrance gate	No	Yes	Fixed
Dome	Sports Centre car park staff entrance gate	No	Yes	Fixed
Turret	Sports Centre pathway and Crowland Road	No	Yes	Fixed
Bullet	Sports Centre main entrance	No	Yes	Fixed
Bullet	Sports Centre external main entry	No	Yes	Fixed
Bullet	Sports Centre car park 1	No	Yes	Fixed
Bullet	Sports Centre car park 2	No	Yes	Fixed
Bullet	Sports Centre car park 3	No	Yes	Fixed
Bullet	Sports Centre pathway Markfield Park entry	No	Yes	Fixed
Turret	Sports Centre main foyer	No	Yes	Fixed
Dome	Sports Centre toilets and changing rooms external	No	Yes	Fixed
Turret	Sports Centre external container	No	Yes	Fixed
Turret	Sports Centre laundry room external	No	Yes	Fixed

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.

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. CCTV Cameras are NOT installed in areas in which individuals would have an expectation of privacy such as toilets, changing facilities, etc.

Members of staff will have access to details of where CCTV cameras are situated.

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. 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 or delegated staff member. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

#### **5. SUBJECT ACCESS REQUESTS (SAR)**

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

All requests should be made in writing to the Data Protection Officer. 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. Depending on the nature of the request and the content of the footage, the School reserves the right as to the format in which the footage or still images may be provided.

The School will respond to requests within 30 days of receiving the request.

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.

## **6. ACCESS AND DISCLOSURE OF IMAGES TO THIRD PARTIES**

There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police.

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.

Requests for images should be made in writing to the Data Protection Officer.

## **7. RESPONSIBILITIES**

The headteacher / responsible officer 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.
- Consider 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 of a minimum of 30 days and no longer than 60 days. This is to take into account the school holiday periods. Recordings are then erased unless required as part of an investigation or court proceedings (criminal or civil).
- 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.

## **8. DATA PROTECTION IMPACT ASSESSMENTS AND PRIVACY**

CCTV has the potential to be privacy intrusive. The school will assess when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and address a pressing need identified.

## **9. POLICY REVIEW**

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