

## CCTV Policy

<b>This policy has been written for...</b>	All staff and students at West Heath School
<b>Copies of this policy may be obtained from...</b>	<ul style="list-style-type: none"> <li>The School <b>web site</b> - <a href="http://www.westheathschool.com">http://www.westheathschool.com</a></li> <li>It is available as a hard copy on request from the <b>school office</b></li> <li>Hard copies for reference are filed in the <b>staff room</b></li> </ul>
<b>This policy links with the following policies</b>	This policy should be read in conjunction with the Data Protection Policy, Transport Policy and Outings, Trips, Visits Policy.
<b>Participants and consultees in the formulation of this policy were...</b>	The Principal, Senior Leadership Team, Student Services Committee and the Trustees of the School. A representative group of students were invited to make comments and suggestions.
<b>Edition, Review frequency and dates</b>	<p>This is edition 4, released March 2020  It is due for review March 2022</p> <p>Note: All West Heath Policies are currently being overviewed, this policy is renewed and will be replaced, if necessary, in September 2021</p>
<b>Relevant statutory guidance, circulars, legislation &amp; other sources of information are...</b>	Data Protection Act 2018 Information Commissioner's Office – CCTV Code of Practice
<b>The Lead Member of staff is</b>	Estates Manager / Deputy Principal/ IT Manager
<b>Definitions and key terms used in this policy...</b>	ICO – Information Commissioner's Office
<b>The Rationale and Purpose of this policy</b>	To regulate the management and use of the closed circuit television (CCTV) system at the School.
<b>Appendices</b>	This policy has no appendices
<b>Copying</b>	No school policy is ever written in isolation. Acknowledgement of sources of advice and significant influence in the development and recording of policies at the West Heath School are noted on the front page. We request that any schools or organisations incorporating large sections of this policy without alteration should make similar appropriate acknowledgement.

## Introduction

- 1.1 The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at West Heath School, hereafter referred to as 'the school'.
- 1.2 The system comprises a number of fixed and rotating cameras located around the school site. Networked camera feeds are available to selected Maintenance, Boarding, IT & senior staff on the CCTV Network.
- 1.3 This policy follows Data Protection Act guidelines and the CCTV Small User Checklist compliance advice will be completed yearly by the school IT Manager.

## The Aims & Objectives of this policy..

- 2.1 To protect the school buildings and their assets.
- 2.2 To increase personal safety and reduce the fear of crime.
- 2.3 To support the police in a bid to deter and detect crime.
- 2.4 To assist in identifying, apprehending and prosecuting offenders.
- 2.5 To protect students, members of staff and visitors.
- 2.6 To assist in managing the school.

## Statement of Intent

- 3.1 The CCTV Scheme is registered with the ICO under the terms of the Data Protection Act 2018.
- 3.2 The school will treat the system and all information, documents and recordings obtained and used, as data which are protected by the Act.
- 3.3 Cameras will be used to monitor activities within the school and it's car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well being of the school, together with it's visitors and contractors.
- 3.4 Materials or knowledge secured, as a result of CCTV, will not be used for any commercial purpose. Recordings will only be made available to law enforcement agencies involved in the prevention and detection of crime, and no other third parties.
- 3.5 The planning and design has endeavoured to ensure that the 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.

- 3.6 Warning signs, as required by the Code of Practice of the ICO have been placed at all access routes to areas covered by the school CCTV.
- 3.7 School vehicles containing audio and video recording facilities are required to have a sticker to alert staff and students that whilst in the vehicle they are being recorded. The recording will be kept for 2 days at which point it will be overwritten unless an accident has taken place and an investigation is underway. In this instance CCTV footage will be retained until the investigation has been completed. Anyone wishing to access footage must request this by consulting a member of SLT and completing the CCTV request form. This must be passed to the Head of Estates and Facilities or the IT Manager

## Procedures & Practices

### **4. Operation of the system**

- 4.1 The Scheme will be administered and managed by the IT Manager and the Estates Manager, in accordance with the ICO CCTV Code of Practice.
- 4.2 The day to day management will be the responsibility of the Senior Leadership Team, the Estates Manager, IT Manager and the Head of Residential. Access to the CCTV facilities will be strictly limited to authorised staff only.
- 4.2 The CCTV system will be operated 24 hours each day, every day of the year.
- 4.3 The Estates Manager and Maintenance Team will check the operation of all cameras on a daily basis and report any faults to the IT Manager. The IT Manager will check the functionality of the system on a weekly basis.

### **5. Monitoring procedures**

- 5.1 Camera surveillance may be maintained at all times.
- 5.2 CCTV will be continuously recorded and will delete automatically.
- 5.3 Video camera evidence of any incident, if available, will be used in investigating incidents of unacceptable behaviour, recognising that CCTV cameras are not, and will not, be used for the monitoring of teaching and learning. They are to deter poor behaviour and for the support and protection of staff, students, visitors, contractors, buildings and assets.
- 5.4 The decision not to have a CCTV camera installed in a classroom is at the discretion of the teacher responsible for

that classroom. Where the teacher responsible for a classroom base would like the CCTV provision switched off, the camera will be disconnected.

- 5.5 Only members of the Senior Leadership Team have the authority to request a transfer of CCTV coverage to removable storage media for evidential purposes. This must be sealed, witnessed, signed, dated and stored in a separate, secure store (i.e the school safe).
- 5.6 The CCTV may be viewed by law enforcement agencies for the prevention and detection of crime. A record will be maintained of the release of any CCTV recordings to the police or other law enforcement agencies.
- 5.7 The police may require the school to retain the stored data for possible use as evidence in the future. Such data will be properly indexed and securely stored until it is needed by the police.
- 5.8 No other applications received from third parties to view or release CCTV recordings will be permitted.
- 5.9 Photographic evidence may be kept and used by the school in identifying, apprehending and prosecuting offenders.
- 5.10 CCTV cameras within the main body of the school contain no audio function. Audio is only available in school vehicles.

## **6. Breaches of the code (including breaches of security)**

- 6.1 Any breach of this Policy by school staff will be initially investigated by the Principal, in order for him or her to take the appropriate disciplinary action.

## **7. Assessment of the scheme and code of practice**

- 7.1 Performance monitoring, including random operating checks, may be carried out by the Principal and the Estates management.

## **8. Complaints**

- 8.1 Any complaints about the school's CCTV system should follow the school's complaints procedure.

## **9. Access by the data subject**

- 9.1 The Data Protection act provides data subjects (individuals to

whom “personal data” relates) with a right to data held about themselves, including those obtained by CCTV.

- 9.2 Requests for data subject access should be made in writing to the Principal.
- 9.3 Any Staff wishing to view CCTV footage must gain approval from the Senior Leadership Team electronically (E-Mail) and complete the CCTV request form in the Staff Room. The electronic authorisation document must be attached to the CCTV request form. Footage can then be viewed providing a second member of staff is present to validate any information.
- 9.4 Boarding staff regularly consult with boarding students regarding appropriate use of CCTV. With consideration to privacy issues, the CCTV's are not fitted in staff offices, lounge areas, kitchen, dining areas, bedrooms, bathrooms and toilets.

The CCTV does not intrude unreasonably on our students' privacy because:

- The CCTV in residential is non-audio (does not record sound) and is motion sensed.
- The CCTV in residential corridors are non-monitored with no screen
- The recordings can only be assessed by the Care Management Team, Senior Leadership Team and Police but, only if the incident is deemed important and serious enough for the CCTV to be reviewed.
- Any request to review the CCTV in residential is also recorded. The requirement is that only 2 members of staff can view the recorded CCTV.
- The CCTV equipment is in a locked room in school where all entries are recorded. All staff are prevented from the server room where the CCTV can be viewed.

Any motion-detected CCTV recordings delete after 28 days

- 9.5 The only Boarding staff authorised to view CCTV footage are Head of Residential Care, Assistant Head of Residential Care and SSW. Approval must be obtained as per 9.3 and a second person from SLT to validate any information.
- 9.6 In instances where investigations are necessary, HR may access and view relevant footage and retain and store them within the HR department, whilst the investigation is underway and until it is concluded. Normal data protection procedures will be followed in these instances.

---

**Persons with particular responsibilities**

Principal  
Senior Leadership team  
Head of Safeguarding & Residential Boarding  
IT Manager  
Estates Manager

---

**Other Participants & Stakeholders**

Students  
Staff

---

**Monitoring & Evaluation**

SLT  
Student Services Committee  
Trustees