



CCTV Policy

Heathlands School



Policy Review

This policy will be reviewed in full by the Governing Board.

The policy was agreed by the Full Governing Board on 6.7.22

Next Review due July 2024.

Signature Date
Co-Headteacher

Signature Date
Governor

1. Introduction

- The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Heathlands School hereafter referred to as 'the school'.
- The system comprises a number of fixed and dome cameras located around the school site. There are two designated control boxes for the CCTV: one for Upper school and one for Lower school and outside areas, and both can be viewed by authorised personnel only.
- This policy follows the UK General Data Protection Regulation and Data Protection Act 2018, hereafter referred to as 'UK GDPR' and the 'ACT' guidelines and will be subject to review bi-annually to include consultation as appropriate with interested parties.
- The CCTV system is owned by the school.

2. Objectives of the CCTV scheme

- To protect the school buildings and their assets
- To increase personal safety
- To support the police in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property
- To assist in managing the school.

3. Statement of intent

- The CCTV Scheme is registered with the Information Commissioner under the terms of the UK GDPR and the Act and will seek to comply with the requirements both of the UK GDPR, the Act and the Commissioner's Code of Practice. . The code of practice is published at : <https://ico.org.uk/for-organisations/guide-to-data-protection/ico-codes-of-practice/>
- Data collected from surveillance and CCTV will be:
 - Processed lawfully, as determined by a DPIA, or from advice from the DPO. In less common circumstances, lawful processing will be determined by a legitimate interest's assessment (LIA).
 - Processed fairly, in a manner that people would reasonably expect, and taking into account advancements in technology that may not be anticipated by some people.
 - Processed in a transparent manner, meaning that people are informed when their data is being captured.
- The use of any video conferencing technology will be fair and transparent. Any pupils and staff who are part of any video conference calls will be informed of its purpose, and recording and publication of any video to an indefinite audience will be consented to and will not be used outside of the intended purpose.
- Cameras will be used to monitor activities within the school, its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school, together with its visitors.
- The cameras will not focus on toilets, changing facilities, on private homes, gardens and other areas of private property.
- Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Copies will only be released by the CoHeads for use in the investigation of a specific crime and by written request from the police. Footage will never be released to the media for purposes of entertainment.
- 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.

- Warning signs have been placed throughout the premises where the surveillance system is active, as mandated by the ICO's Code of Practice. Warning signs will be more prominent in areas where surveillance is less expected to be in operation, and when using systems that can capture a large amount of personal data at one time.

4. Operation of the system

- The scheme will be administered and managed by the CoHeads, in accordance with the principles and objectives expressed in the code.
- The day-to-day management will be the responsibility of both the Senior Leadership Team (SLT) including School Business Manager, IT consultant and the Caretakers.
- The CCTV system will be operated 24 hours each day, every day of the year.
- The IT consultant will make routine checks and confirm the efficiency of the system and in particular that the equipment is properly recording and that cameras are functional.
- Access to the system will be strictly limited to Senior Leadership Team, School Business Manager, IT consultant and Caretakers.
- During the working day when not manned the control rooms are secured.
- When the need for maintenance arises – the caretaker must be satisfied of the identity and purpose of contractors before allowing access.
- The system is set to record on a loop and therefore only records the last 30 days before data is overwritten.
- Relevant data can be selected and downloaded onto an encrypted memory stick, which would only happen when an incident arises. These 'copies' are only made to provide information to the required authorities if required as part of an investigation and kept for no longer than absolutely necessary.

5. Security

- Access to the surveillance system, software and data will be strictly limited to authorised operators, and will be password protected, and where appropriate, will be encrypted. In exceptional cases where large amounts of information need to be collected and retained, the school will consider using cloud storage. This will be secure and only accessible to authorised individuals.
- Heathlands School authorised CCTV system operators are
 - Lesley Reeves-Costi, CoHead
 - Sarah Shields, CoHead
 - Jason Hazrati, Deputy Head Teacher
 - Sara Head, Assistant Head Teacher
 - Carol Bush, School Business Manager
 - John West, Caretaker
 - Steven Dent, Caretaker
 - Jordan Clark, IT Consultant
 - Paul Chandler, IT Maintenance.
 - Dan Bloomfield, Site Assistant.

Staff will be trained in security procedures, and sanctions will be put in place for those who misuse security system information. Staff will be made aware that they could be committing a criminal offence if they do this.

6. Copies made from CCTV hard drive

The ability to produce copies of information will be limited to the appropriate staff.

Each system will have a separate audio and visual system that can be run independently of one another. The school will not record audio unless it has:

- Identified a particular need or issue and can evidence that this need must be addressed by audio recording;
- Considered other less privacy intrusive methods of achieving this need;
- Reviewed the other less privacy intrusive methods and concluded that these will not appropriately address the identified issue and the only way to do so is via the use of audio recording.
- In order to maintain and preserve the integrity of the copies used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:
 - Each disc must be identified by a unique mark.
 - Before using, each disc must be cleaned of any previous recording.
 - A register shall be kept of each copy recorded and who holds the copy including whether passed to police etc.
 - A recording required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence store.
- Recordings may be viewed by the police for the prevention and detection of crime and authorised officers of the Council. A record will be maintained of the release of recordings to the police or other authorised applicants. A register will be available for this purpose. Viewing of recordings by the police must be recorded in writing and in the log book. Requests by the police can only be actioned under Schedule 2 Part 1 Para. 2 or Para. 5 of the Act 2018, formerly section 29 of the Data Protection Act 1998.
- In the absence of a court order or other legal process, copies will only be released to the Police on the clear understanding that the copy remains the property of the school. The school also retains the right to refuse permission for the police to pass to any other person the recording or any part of the information contained thereon. On occasions when a Court requires the release of an original recording, this will be produced from the secure evidence store, complete in its sealed bag.
- The police may require the school to retain the stored discs for possible use as evidence in the future. Such discs will be properly indexed and properly and securely stored in the Finance safe until they are needed by the police.
- Applications received from outside bodies (for example solicitors) to view or release copies will be referred to the CoHeads. In these circumstances copies will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a court order.

7. Breaches of the code (including breaches of security)

- Any breach of the Code of Practice by school staff will be initially investigated by the CoHeads, 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.

8. Complaints

- Any complaints about the school's CCTV system should be addressed to the CoHeads.
- Complaints will be investigated in accordance with of this Code.

9. Access by the data subject

Requests for data subject access should be made to the Data Protection Officer, Yvonne White at dpo@heathlands.herts.sch.uk or via the School Office.

In the absence of the Data Protection Officer, the School Business Manager, Carol Bush, will deputise.

The UK UK GDPR and Act provide data subjects (individuals to whom 'personal data' relates) with a right to data held about them, including those obtained by CCTV.

- Individuals have the right to have personal data erased if:
 - The data is no longer necessary for the original purpose it was collected for.
 - They are relying on legitimate interests as a basis for processing, the individual objects to the processing of their data, and there is no overriding legitimate interest to continue the processing.
 - The data has been processed unlawfully.
 - There is a specific legal obligation.
- There are certain exceptions where the right to erasure cannot be exercised, these include, but are not limited to:
 - Where the processing is needed for the performance of a task in the public interest or an official authority.
 - Certain research activities.
 - Compliance with a specific legal obligation.
- As an alternative to the right of erasure, individuals can limit the way their data is used if they have issues with the content of the data held by the school or they object to way it was processed.
- Data can be restricted by either:
 - Moving the data to another processing system.
 - Making the data unavailable to users.
 - Temporarily removing published data from a website.

The school will verify the identity of the person making the request before any information is supplied.

A copy of the information will be supplied to the individual free of charge; however, the school may impose a 'reasonable fee' to comply with requests for further copies of the same information. The individual will either be provided with a permanent copy of the information or allowed to view the information.

Where data requests contain the personal data of a separate individual, the rights and freedoms of others will be protected by asking for their consent, or removing specific footage where appropriate.

General Data Protection Regulation and Data Protection Act 2018: Data Protection Principles

Article 5 of the UK GDPR sets out seven key principles:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

Article 5(1) fully explains the key principles and requires that personal data shall be:

(a) processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');

(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');

(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');

(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the UK GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation');

(f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')."

Article 5(2) adds that:

"The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('accountability')."

Checklist

This CCTV system and the images produced by it are controlled by Carol Bush 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 UK GDPR and the Act.)

Heathlands School 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.

	Checked (Date)	By Carol Bush	Date of next review 1/6/2022
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Renewal date 15/1/21		
There is a named individual who is responsible for the operation of the system.	Yes		
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		
Staff and members of the school community will be consulted about the proposal to install further CCTV equipment.	Yes		
Cameras have been sited so that they provide clear images.	Yes		
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Yes		
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		
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes		
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. = 30 days	Yes		
Except for law enforcement bodies, images will not be provided to third parties.	Yes		
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.	Yes		
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes		

CCTV Locations

1. Front gate
2. Outside reception
3. Nursery garden - External Play Area
4. Rear door HH foyer
5. HH Foyer
6. Career Lobby
7. Rear door to Astro turf
8. Girls boarding stairwell
9. Media Corridor
10. Media Stairs