



Benton Park School CCTV Policy and Procedure

January 23

Review Due: January 24

1.0 Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Benton Park School. The system comprises a number of fixed cameras located around the School site (Images from the system are available to be viewed at the ICT Office, the Site Office and from the Safety and Facilities Managers desk. CCTV **live images** can be viewed by reception and the site team for security purposes. Access to recorded images are password protected and therefore restricted to a limited number of Authorised Staff detailed in section 4.

2.0 Relevant Legislation and Guidance

This policy is based on:

- [UK General Data Protection Regulation](#)
- [Data Protection Act 2018](#)
- [Human Rights Act 1998](#)
- [European Convention on Human Rights](#)
- [The Regulation of Investigatory Powers Act 2000](#)
- [The Protection of Freedoms Act 2012](#)
- [The Freedom of Information Act 2000](#)
- [The Education \(Pupil Information\) \(England\) Regulations 2005 \(as amended in 2016\)](#)
- [The Freedom of Information and Data Protection \(Appropriate Limit and Fees\) Regulations 2004](#)
- [The School Standards and Framework Act 1998](#)
- [The Children Act 1989](#)
- [The Children Act 2004](#)
- [The Equality Act 2010](#)

3.0 Objectives of the CCTV Scheme

- To contribute to the safety of the school environment for students and staff.
- To protect the School buildings and their assets.
- To increase personal safety and reduce the fear of crime or undesirable behaviour.
- To deter criminals from targeting the school and discourage antisocial behaviour.
- To support the Police in a bid to deter and detect crime.
- To assist in identifying, apprehending and prosecuting offenders.
- To assist in the operational management of the school including the management of behaviour of students and staff.

4.0 Statement of Intent

The CCTV Scheme has been registered by the school with the Information

Commissioner Office (ICO) <https://ico.org.uk/> under the terms of the Data Protection Act 2018 and the School will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.

The School will treat the system and all information, documents and recordings obtained and used as data which are protected by the legislation.

Cameras will be used to monitor activities within the School to identify criminal activity and/or undesirable behaviour actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of students, staff and visitors.

Wherever cameras are installed appropriate signage is in place to warn members of the school community that they are under surveillance.

Cameras are positioned in order to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

Cameras placed in particularly sensitive areas such as student toilets are integral to the safeguarding of our students in high risk areas. Cameras located in sensitive areas must be appropriately angled as to maintain safety and security of students and staff without the loss of dignity, respect or decency. Cameras in high risk areas and the resulting recordings will be checked regularly by Child Protection Designated staff and/or the Safety and Facilities Manager to ensure they have not been tampered with. Any arising safeguarding concerns regarding misuse of cameras will be reported to the Local Authority Designated Officer and the Police.

Staff that have access to the CCTV system will ensure that cameras are not to focus on private homes, gardens and other areas of private property.

Unless an immediate, anticipated or perceived response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals (Directed Surveillance), without written authorisation being obtained from the Headteacher. Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Images will only be released to the media for use in the investigation of a specific crime and with the written authority of the Police. Images will never be released to the media for purposes of entertainment.

Where the school becomes aware of an incident pertaining to students, staff or visitors on site that warrants investigation any recordings of the incident may be used by the investigating officer as evidence. It is the responsibility of the officer to ensure that recordings are kept safe and secure and only to be used for the purpose of the investigation. Once the investigation is done the recording can be filed on the students or staff file or destroyed.

Warning signs, as required by the Information Commissioner's Code of Practice have been placed at all access routes to areas covered by the Scheme.

5.0 Operation of the System

The CCTV system records 24 hours each day, every day of the year.

The Scheme will be administered and managed by the Safety and Facilities Manager, in conjunction with the IT Services team, in accordance with this Policy. The day-to-day management will be the responsibility of the Safety and Facilities Manager supported by the Head of IT Services .

The Safety and Facilities Manager is responsible for checking and confirming the efficiency and security of the system and in particular that the equipment is properly recording and that cameras are working.

When there is a problem with any of the CCTV cameras or recording equipment that cannot be resolved at site, the CCTV Contractor will be contacted.

Access to the recorded images is to be strictly controlled by a password system managed by the Head of IT Services and the Safety and Facilities Manager. Routine viewing of recorded images is to be limited to:

- The Headteacher
- The Deputy Headteacher
- Child Protection Designated staff
- Key-Stage Leaders.
- Pastoral staff for investigating student behaviour.
- The Head of IT Services, or in his absence a nominated deputy.
- The Safety and Facilities Manager or in their absence a nominated deputy.
- The Facilities Team Leader
- Facilities Officers
- Members of the Senior Leadership Team for investigating student behaviour

Wherever reasonably practicable the viewing of CCTV data whether live or recorded will be carried out by 2 authorised individuals being present and the access and reasons for it recorded in the register. On occasions where a single authorised individual requires access to the footage, live or recorded the Headteacher will be notified and the reason for the access recorded in the register.

When circumstances require, the Head of IT Services , Safety and Facilities Manager and the Headteacher/Deputy Head have authority to allow other members of staff to view discrete recorded images. Staff who view the recorded images will be recorded in a Register held by the Safety and Facilities Manager. Viewing of images by the Police on provision of a DP7 will also be recorded in the Register.

6.0 Image Control

The CCTV Contractor is to ensure that images are only held for a maximum of 30 days and are then overwritten. The main school building holds images on record for 30 days. The N-Block building holds images on record for 8 days.

On occasion footage may be retained for longer than 30 days, for example where an internal investigation of an incident is taking place and/or law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation.

Recordings will be downloaded and encrypted, so that the data will be secure and its integrity maintained, so that it can be used as evidence if required.

Cameras will be pointed and focused on several points/areas agreed in advance by the Headteacher or nominated deputy in consultation with the Head of IT Services and the Safety and Facilities Manager. The IT Services Manager and/or the Safety and Facilities Manager on authority from Headteacher shall be allowed to modify camera positions in response to a particular event or circumstances that is deemed to require surveillance.

Unless an immediate, anticipated or perceived response to events is required, cameras must not be directed at an individual or a specific group of individuals or used for covert surveillance.

A record will be maintained of the release of images to the Police or other authorised applicants. This will be recorded in the Register held by the Safety and Facilities Manager.

Requests by the Police can only be actioned under Section 29 of the Data Protection Act on provision of a DP7. Should images be required as evidence, a copy may be released to the Police under their evidence guidelines. Images will only be released to the Police on the clear understanding that the image remains the property of the School, and both the images and associated information are to be treated in accordance with this Policy. The School also retains the right to refuse permission for the Police to pass the images to any other person.

Applications received from outside bodies (e.g. solicitors) to view or release images will be referred to the Headteacher who will seek advice from the LCC Information Management Team and our Data Protection Officer. In these circumstances images 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.

Any requests for release of CCTV images as part of a Subject Access Request will be considered on a case by case basis. Individuals making a request should provide the school with reasonable information such as the date, time and location the footage was taken to aid school staff in locating the footage.

The school reserves the right to refuse a SAR, if, for example, the release of the footage to the subject would prejudice an ongoing investigation. Equally, if the footage identifies other individuals and their identity cannot be obscured then the school will refuse to release the footage.

7.0 Breaches of the Policy (including breaches of security)

Any breach of the Policy by school staff will be initially investigated by the HR Director or a nominated Investigating Officer and appropriate disciplinary action will be taken. Any serious breach of the Information Commissioner's Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

8.0 Complaints

Any complaints about the School's CCTV system should be addressed in writing to the Headteacher who will nominate an Investigating Officer to carry out an investigation.

9.0 Access by the Data Subject

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. Requests for Data Subject Access should be made in writing to the Headteacher.

10.0 Public information

Copies of this policy will be available to the public on the school's website or in paper form from the Safety and Facilities Manager.



BENTON PARK SCHOOL

CREATING A CLIMATE FOR GREAT
LEARNING, SUCCESS AND OPPORTUNITY

CCTV Log

Date CCTV viewed				
Time CCTV viewed				
Date of incident				
Time of incident	From		To	
Requested by				
Reason for request				
Who viewed CCTV				
What cameras / area was viewed				
Details of Incident				
Recordings				
Is a recording needed for school purpose	Yes		No	
Is a recording needed for police purpose	Yes		No	
Images released to the media	Yes		No	
Any other parties involved				
Any other actions				

Signatures

Name	Signed	Date

Record number	
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