

Closed Circuit Television (CCTV) Policy

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INTRODUCTION

Closed Circuit Television Systems (CCTV) are installed at The Gatwick School Their operation will be reviewed regularly in consultation with staff and the Local Academy Board

1. PURPOSE OF POLICY

“The purpose of this policy is to regulate the use of Closed-Circuit Television and its associated technology in the monitoring of both the internal and external environs of the premises under the remit of The Gatwick School.”

CCTV systems are installed (both internally and externally) 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.
- preventing bullying.
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- assisting in identifying, apprehending, and prosecuting offenders; and
- ensuring that the school rules are respected so that the school can be properly managed.

2. SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. Where classes and activities are carried out in rented premises, The Gatwick School will ensure that CCTV systems, where installed, are operated only in a way that is compatible with the provisions of this policy.

3. GENERAL PRINCIPLES

The Gatwick School as the corporate body has a statutory responsibility for the protection of its property, equipment and other plant as well providing a sense of security to its employees, students, and invitees to its premises. The Gatwick School owes a duty of care under the provisions of Safety, Health and Welfare at Work Act 2005 and associated legislation and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the



quality of life of the school community by integrating the best practices governing the public and private surveillance of its premises.

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g., CCTV will not be used for monitoring employee performance.

Information obtained through the CCTV system may only be released when authorised by the Headteacher, following consultation with the CEO of Aurora Academies Trust. Any requests for CCTV recordings/images will be fully recorded and legal advice will be sought if any such request is made. (See "Access" below). If a law enforcement authority, such as the Police, is seeking a recording for a specific investigation, a written request (and legal advice might be) be sought. This is in full compliance with all GDPR policies.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including Equality & Diversity Policy, Dignity at Work Policy, Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other educational and related legislation.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g., race, gender, sexual orientation, national origin, disability etc.

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.

Information obtained in violation of this policy and/or not following the correct procedures/processes as set out in this document, may not be used in a disciplinary proceeding against an employee of the school or a disciplinary proceeding against a student attending the school.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by The Gatwick School. Recognisable images captured by CCTV systems are "personal data." They are therefore subject to the provisions of the Data Protection Acts 1988, 2003 and 2018.

4. JUSTIFICATION FOR USE OF CCTV

Section 2(1)(c)(iii) of the Data Protection Acts requires that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that The Gatwick School needs to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV to control the perimeter of the school buildings for security purposes has been deemed to be justified by the board of management. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

CCTV systems will not be used to monitor normal teacher/student classroom activity in school.

In other areas of the school where CCTV has been installed, e.g., hallways, stairwells, locker areas, the Headteacher has demonstrated that there is a proven risk to security and/or health & safety and that the installation of CCTV is proportionate in addressing such issues that have arisen prior to the installation of the system.

5. LOCATION OF CAMERAS

The location of cameras is a key consideration. Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. The Gatwick School has endeavored to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.



Cameras are placed to record external areas are positioned in such a way as to prevent or minimize recording of passers-by or of another person's private property. **CCTV Video Monitoring and Recording of Public Areas in The Gatwick School 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, Washroom areas and bathroom areas – communal area only – individual cubicle do not have any CCTV within for privacy of all who require them.
- ***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:*** Robbery, burglary, and theft surveillance

6. COVERT SURVEILLANCE

The Gatwick School will not engage in covert surveillance.

7. NOTIFICATION – SIGNAGE

The Headteacher will provide a copy of this CCTV Policy on request to staff, students, parents, and visitors to the school. This policy describes the purpose and location of CCTV monitoring, a contact number for those wishing to discuss CCTV monitoring and guidelines for its use. The location of CCTV cameras will also be indicated to the CEO. Adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation. Adequate signage will also be prominently displayed at the entrance to The Gatwick School property.

Signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.



WARNING

CCTV cameras in operation

Images are being monitored and recorded for the purpose of crime prevention, the prevention of anti-social behavior, the prevention of bullying, for the safety of our staff and students and for the protection of The Gatwick School and its property.

This system will be in operation 24 hours a day, every day. These images may be passed to law enforcement agencies.

This scheme is controlled by The Gatwick School and IPS.

**If you have any concerns, please contact the Data Controller:
icthelpdesk@thegatwickschool.org.uk**

Appropriate locations for signage will include:

- at entrances to premises i.e., external doors, school gates.
- reception area
- at or close to each internal camera

8. STORAGE & RETENTION

Section 2(1)(c)(iv) of the Data Protection Acts states that data "shall not be kept for longer than is necessary for" the purposes for which it was obtained. A data controller needs to be able to justify this retention period, Where the images identify an issue – whether this be a behaviour/incident/building issue these images/recordings are retained specifically in the context of an investigation/prosecution of that issue.

Our policy for these instances is that they can be kept for a maximum of 1 year from the date of the recording.

The images/recordings will be stored in a secure environment. Access will be restricted to authorised personnel and can only be accessed at The Gatwick School; no remote access is available. Encrypted USB sticks can only be used when an external person requests the footage, in accordance with the school's Data Protection Policy.

Supervising the access and maintenance of the CCTV System is the responsibility of the Headteacher. The Headteacher may delegate the administration of the CCTV System to another staff member. In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above (such individuals may include the Deputy Head, the relevant Designated Safeguarding Lead, other members of the teaching, pastoral and support staff (as deemed appropriate), representatives of the Department of Education, representatives of the HSE).

9. ACCESS

Server hard drives (which store the recorded footage) and the CCTV recording equipment is stored securely in a restricted area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel.

Access to the CCTV system and stored images will be restricted to authorised personnel only.

In relevant circumstances, CCTV footage may be accessed:

- By Police if The Gatwick School make a report regarding the commission of a suspected crime; or
- Following a request from Police, when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on The Gatwick School property, or
- To the HSE (Health & Safety Executive) and/or any other statutory body charged with child safeguarding; or
- To assist the Headteacher or Deputy Headteacher in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to The Gatwick School, or
- To individuals (or their legal representatives) subject to a court order.
- To The Gatwick School insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

Requests by Police: Information obtained through video monitoring will only be released when authorised by the Headteacher, following consultation with the CEO. If Police request CCTV images for a specific investigation, Police may require a warrant and accordingly any such request made by Police should be made in writing and The Gatwick School may seek legal advice.

Access requests: On written request, any person whose image has been recorded has a right to be given a copy of the information recorded which relates to them, provided always that such an image/recording exists i.e., has not been deleted and provided also that an exemption/prohibition does not apply to the release. Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that the other person is not identified or identifiable. To exercise their right of access, a data subject must make an application in writing to the Data Protection Officer of The Gatwick School. The school may charge up to £50 for responding to such a request and must respond **within 30 days**.

Access requests can be made to the following: The Data Protection Officer via dataprotectionofficer@auroraacademies.org.



A person should provide all the necessary information to assist The Gatwick School in locating the CCTV recorded data, such as the date, time, and location of the recording. If the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data and may not be handed over by The Gatwick School

In giving a person a copy of their data, The Gatwick School may provide a still/series of still pictures or an encrypted USB stick with relevant images. However, other images of other individuals will be obscured before the data is released.

10. RESPONSIBILITIES

The Headteacher will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by The Gatwick School
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within The Gatwick School
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy.
- Ensure that the CCTV monitoring at The Gatwick School 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.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally.
- Provide a list of the CCTV cameras and the associated monitoring equipment and the capabilities of such equipment, located in The Gatwick School to the CEO for formal approval.
- 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.
- Co-operate with the Health & Safety Officer of The Gatwick School in reporting on the CCTV system in operation in the school.
- 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 the server hard drives stored in a secure place with access by authorised personnel only.
- Ensure that access to the storage access folder on the network, is only accessible to those who have the required permissions.
- Any encrypted USB sticks used for the transportation of images to an external person, are stored securely by the IT Manager in the Server Room until provided to the external person face to face. If encrypted USB sticks cannot be delivered face to face, then only be sent via Royal Mail Tracked & Signed For Delivery.
- Ensure that images recorded on the CCTV system are only stored for a period of 28 days and are then automatically erased.
- CCTV images (still and moving) that are downloaded as part of an investigation, will be deleted one year from the date of recording.
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy. The zoom facility can only be accessed by the central controller, based in the server room.
- 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.



11. IMPLEMENTATION & REVIEW

The policy will be reviewed and evaluated from time to time. On-going review and evaluation will take cognisance of changing information or guidelines.

The date from which the policy will apply is the date of adoption by the Interim Executive Board/Local Academy Board. Implementation of the policy will be monitored by the Headteacher.



APPENDIX 1 – DEFINITIONS

Definitions of words/phrases used in relation to the protection of personal data and referred to in the text of the policy.

CCTV – Closed-circuit television is the use of video cameras to transmit a signal to a specific place on a limited set of monitors. The images may then be recorded on video tape or DVD or other digital recording mechanism.

The Data Protection Acts – The Data Protection Acts 1988 and 2003 and 2018 confer rights on individuals as well as responsibilities on those persons handling, processing, managing, and controlling personal data. All school staff must comply with the provisions of the Data Protection Acts when collecting and storing personal information. This applies to personal information relating both to employees of the organisation and individuals who interact with the organisation

Data - information in a form that can be processed. It includes automated or electronic data (any information on computer or information recorded with the intention of putting it on computer) and manual data (information that is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system).

Personal Data – Data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

Access Request – this is where a person makes a request to the organisation for the disclosure of their personal data under Section 3 and/or section 4 of the Data Protection Acts.

Data Processing - performing any operation or set of operations on data, including:

- Obtaining, recording, or keeping the data,
- Collecting, organising, storing, altering, or adapting the data,
- Retrieving, consulting, or using the data,
- Disclosing the data by transmitting, disseminating, or otherwise making it available,
- Aligning, combining, blocking, erasing, or destroying the data.

Data Subject – an individual who is the subject of personal data.

Data Controller - a person who (either alone or with others) controls the contents and use of personal data.

Data Processor - a person who processes personal information on behalf of a data controller but does not include an employee of a data controller who processes such data in the course of their employment, for example, this might mean an employee of an organisation to which the data controller out-sources work. The Data Protection Acts place responsibilities on such entities in relation to their processing of the data.



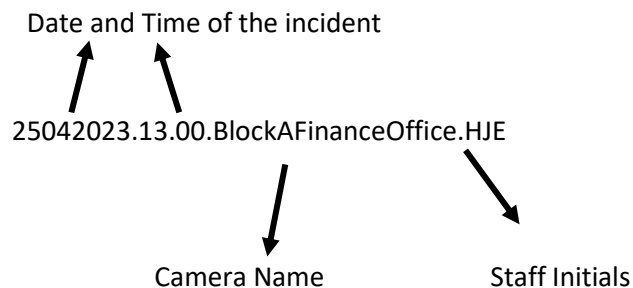
APPENDIX 2 - LIST OF CCTV ACCESS USERS

Authority to view, download and save CCTV images.

Headteacher
Deputy Headteachers
Assistant Headteacher - Behaviour
Assistant Headteacher - Inclusion
Assistant Headteacher - Teaching & Learning
IT Manager
Premises Manager
Key Stage Leaders
Heads of Year
Deputy Heads of Year
Headspace Manager

APPENDIX 3 - PROTOCOL FOR NAMING AND SAVING IMAGES

Naming Convention:



Saving Protocol:

Following file extraction and auto saving into the correct server drive, the recording will stay in that location for 1 year from the date of the extraction of the recording.



APPENDIX 4 – PROCESS OF REQUESTING CCTV

The following roles within the school all have access to the CCTV system and can extract clippings as and when requested.

The process is as follows:

1. Radio for a member of the CCTV Team to make themselves available to you.
2. Decision to be made if an extraction is required or if other members of staff need to view.
3. If extraction is required, follow the correct naming convention as below in appendix 3.

Headteacher
Deputy Headteachers
Assistant Headteacher - Behaviour
Assistant Headteacher - Inclusion
Assistant Headteacher - Teaching & Learning
Key Stage Leaders
Heads of Year
Deputy Heads of Year
Headspace Manager

Please note these users are not to be contacted for CCTV access unless there is an issue with a camera or software failure:

IT Manager
Premises Manager



APPENDIX 5 – SIGNED CONTRACT FOR ALL CCTV ACCESS USERS

I have read and fully understand the CCTV Policy.

I fully understand that for security, safety and GDPR reasons that the processes with regards to extracting CCTV must be always adhered to.

I will be signing below as confirmation of the above statement.

Full Name:

Job Title:

Date:

Signature: