



Ringwood School

Policy Name	CCTV System Policy
Date of Current Policy	February 2024
Author	Operations Manager
Created on	25 Sept 2018
Authorised By	Full Governing Body
Review Frequency	2 years
Review Date	February 2026
Rationale for Policy	Statutory

Introduction

The school recognises that CCTV systems can be privacy intrusive.

Review of this policy shall be repeated regularly and whenever new equipment is introduced a review will be conducted and a risk assessment put in place. We aim to conduct reviews no later than every two years.

Objectives

The purpose of the CCTV system is to assist the school in reaching these objectives:

- (a) To protect students, staff and visitors against harm to their person and/or property.
- (b) To increase a sense of personal safety and reduce the fear of crime.
- (c) To protect the school buildings and assets.
- (d) To support the police in preventing and detecting crime.
- (e) To assist in identifying, apprehending and prosecuting offenders.
- (f) To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence
- (g) To assist in managing the school.

Purpose of This Policy

The purpose of this Policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at the school.

The CCTV system used by the school comprises of 89 cameras throughout the school site. Cameras are situated internally and externally. External cameras are fitted with infrared lighting for night use. One camera, in Reception also records sound. The system is recorded onto three Digital Recorders located within the school server rooms which typically store around 10-12 days of footage.

CCTV cameras are not installed in areas in which individuals would have an expectation of privacy such as toilet cubicles and changing facilities.

Statement of Intent

CCTV cameras are installed in such a way that they are not hidden from view. Signs are predominantly displayed where relevant so that staff, students, visitors and members of the public are made aware that they are entering an area covered by CCTV. The signs also contain contact details as well as a statement of purposes for which CCTV is used.

The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.

The school will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

The system has been designed so far as possible to deny observation on adjacent 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.

Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design has endeavoured to ensure that the system 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, as required by the Code of Practice of the Information Commissioner will be clearly visible on the site and make clear who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

CCTV images are not retained for longer than necessary, taking into account the purposes for which they are processed. Data storage is automatically overwritten by the system after a period of 10-12 days.

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. In the absence of a compelling need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 6 months.

System Management

Access to the CCTV system and data shall be password protected.

The CCTV system will be administered and managed by the Operations Manager who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the System Manager the system will be managed by the Assistant Headteacher for Behaviour.

The system and the data collected will only be available to the System Manager, their replacement and appropriate members of the senior leadership team or governing body as determined by the Headteacher.

The CCTV system is designed to be in operation 24 hours per day, 365 days per year, though the school does not guarantee that it will be working during these hours.

The Operations Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.

Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by providing clear, usable images.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

Where a person other than those mentioned above requests access to the CCTV data or system, the System Manager must satisfy themselves of the identity and legitimacy of purpose of any person making such request. Where any doubt exists access will be refused.

Details of all visits and visitors accessing the CCTV system will be recorded on a system log book including time/date of access and details of images viewed and the purpose for so doing.

Video and images should only be viewed on the main control system and not shared with other persons electronically, other than the Police as mentioned further in this policy.

Video and images are not to be stored on removable media or shared via the school networks in any format. All images and video files should be kept in their original formats.

Video and images should not be recorded onto any other device.

Downloading Captured Data

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any download media used to record events from the hard drive must be prepared in accordance with the following procedures: -

- (a) Each download media must be identified by a unique mark.
- (b) Before use, each download media must be cleaned of any previous recording.
- (c) The System Manager will register the date and time of download media insertion, including its reference.
- (d) Download media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a download media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the electronic evidence store.
- (e) If download media is archived the reference must be noted.

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, their replacement and the Headteacher and other authorised senior leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any download media to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police where a formal request has been made under Section 29 of the Data Protection Act 2018 and on the clear understanding that the download media (and any images contained thereon) remains the property of the school, and download media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the school to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until they are needed by the police.

Applications received from outside bodies (e.g. solicitors or parents) to view or release images will be referred to the school's Data Protection Officer and a decision made by a senior leader of the school in consultation with the school's data protection officer.

Where CCTV footage has been instrumental in the Headteacher's decision to Permanently Exclude a student, this footage may be used at the Governors' Disciplinary Committee (GDC) Hearing. Where footage is used, it will be shown to all parties at the Hearing simultaneously and will normally be in a redacted form. A CCTV summary may also be presented in the bundle of documents prepared for the Hearing. Chairs of GDCs may note that an adjournment in the Hearing following the viewing of CCTV may be beneficial to allow parties to reflect upon the footage.

Complaints about the use of CCTV

Any complaints in relation to the school's CCTV system should be addressed to the Operations Manager.

Request for access by the Data Subject

The Data Protection Act provides Data Subjects – those whose image has been captured by the CCTV system and can be identified - with a right to data held about themselves, including those obtained by CCTV. Requests for such data should be made to the Operations Manager.