



CCTV POLICY

Date of Issue	November 2020
Review Date	November 2022
Ratified by	F&P, Policy Sub Committee
Date	September 2020
Produced by School	Yes
Notes:	
SLT responsible:	Business Manager
Signatures:	
Chair of Governor	
Headteacher	

FEARNHILL SCHOOL

Introduction

This policy details the purpose, use and management of the CCTV system at Fearnhill School and details the procedures to be followed in order to ensure the School complies with relevant legislation and the current Information Commissioner's Office Code of Practice. The ICO CCTV Code of Practice: <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

This policy statement and the accompanying arrangements will be reviewed on an annual basis.

This policy statement supplements the following policies:

- Fearnhill General Data Protection Regulation Policy
- Fearnhill E Safety & Data Security Policy
- Fearnhill Data Security policy

CCTV System overview

Fearnhill School (The School) has in place two separate Closed-Circuit Television (CCTV) systems, a monitored system covering the grounds and buildings (External CCTV) and an internal CCTV system covering communal areas within the school, entrances and exits (Internal CCTV). The School uses both Internal and External CCTV to protect the school buildings and school assets.

- The CCTV system comprises of monitored recording equipment, fully functional and fixed dome cameras.
- The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.
- The CCTV System does not have sound recording capability.
- The CCTV System is owned and operated by the school. The deployment of the system is determined by the Senior Leadership Team.
- The school's CCTV system is registered with the Information Commissioner under the terms of the General Data Protection Regulation 2018. The use of CCTV and the associated images are covered by General Data Protection Regulation 2018. This policy outlines the school's use of CCTV and how it complies with the General Data Protection Regulation 2018.
- Signs are placed at pedestrian and vehicular entrances in order to inform staff, students, visitors and members of the public that CCTV is in operation.

Purpose of the CCTV System

The principal purposes of the School's CCTV system are as follows:

- For the prevention, reduction, detection and investigation of crime and other incidents.
- To ensure the safety of staff, students and visitors.
- To assist in the investigation of suspected breaches of school regulations by staff or students.
- The CCTV system will be used to observe the school premises in order to identify incidents requiring a response. Any response will be proportionate to the incident being witnessed.

Monitoring and Recording

Images are recorded centrally on servers located securely in a locked room at all times. Access to the system will be controlled by the Senior Leadership Team (SLT) and the Network Manager.

SLT and the Network Manager have direct access to view and download footage for storage or to submit as evidence.

Staff requests to view footage must be made to the Network Manager. The Network Manager will assess the request within one working day, if the request is deemed to be serious the Network Manager will request authorisation from a member of SLT.

The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed and all cameras are checked daily to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.

The School does not conduct covert monitoring or recording and will not implement this without consultation with the staff.

All images recorded by the CCTV System remain the property and copyright of Fearnhill School.

All staff involved in the operation of the School's CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.

The CCTV System is monitored out of hours by The Hertfordshire CCTV Partnership Ltd. monitoring service. The Hertfordshire CCTV Partnership Ltd code of practice: <http://www.hertfordshirecctv.co.uk/code-of-practice/>

Retention of Images

The School retains CCTV recorded video (footage) for thirty days from date of recording, at which point it is automatically overwritten from the system. Footage to be used as evidence will be placed in a secure location and kept only as long as required as evidence.

Images held in excess of their retention period will be reviewed by the Network Manager on a three monthly basis and any not required for evidential purposes will be deleted.

Access to retained CCTV is restricted to the Network Manager and the SLT.

Compliance with Data Protection Legislation

The School complies with the Data Protection Act 1998 and as of May 2018 the General Data Protection Regulation. Due regard will be given to the data protection principles contained within GDPR which provide that personal data shall be:

- Processed lawfully, fairly and in a transparent manner.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date.
- Kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed.

- 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.

Applications for disclosure of Images

Applications by individuals

Requests by individual data subjects for images relating to themselves “Subject Access Request” should be submitted in writing to the Deputy Headteacher with proof of identification.

In order to locate the images on the School’s system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

Where the School is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

Access to and disclosure of images to third parties

All requests for footage made by a third party should be made in writing to the Business Manager.

It may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.

Where a suspicion of misconduct arises and at the formal request of the Investigating Officer or HR Manager/Advisor, the Business Manager may provide access to CCTV images for use in staff disciplinary cases.

The Network Manager will retain a record of any disclosures made under the policy.



ROLES AND RESPONSIBILITIES

The Data Protection Officer (the DPO) is responsible for ensuring the School is compliant with GDPR. We subscribe to Herts for Learning's GDPR Support Service. The Post of Deputy DPO is held by Tim Spencer, Deputy Head DPO@fearnhill.herts.sch.uk.

Roles and Responsibilities

Name	Role	Responsibility
Liz Ellis	Head Teacher	Overall responsibility
Tim Spencer	Deputy Head Teacher/Deputy DPO	DSP, Child Protection
Nat Baker	Assistant Head Teacher Pastoral	Senior DSP, Child Protection
Hazel Rainbow	Business Manager	Grounds, buildings, fixtures and fittings
Martyn Beer	Network Manager	School network and connectivity