



Closed Circuit Television (CCTV) Policy



The
Birkenhead Park
School

Adopted by Board: 13 December 2016
Review Period: 3yrs
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Person responsible for policy: IT Director

Closed Circuit Television (CCTV) Policy

1) Introduction

BePART Educational Trust is committed to the highest standards of ethical conduct and integrity in its activities. The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system within BePART Educational Trust. CCTV is in use to;

- To increase the personal safety of staff and students and reduce the fear of physical abuse, intimidation and crime. (Safeguarding arrangements).
- To protect the Academy buildings and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption.
- To support the Police in a bid to deter and detect crime.
- To assist in identifying, apprehending and prosecuting offenders on the Academy site.
- To protect members of the public and private property.
- To assist in the usage and management of the Academy building on a day to day basis

2) Statement of Intent

The CCTV Scheme is registered with the Information Commissioner's Office under the terms of the Data Protection Act 1998 and each institution will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.

All BePART Educational Trust institutions will treat their system and all information, documents and recordings obtained and used, as data which are protected by the Act.

Cameras may be used to monitor activities within Trust buildings and their car parks and other public areas to identify criminal activity actually occurring, anticipated or perceived, and for the purpose of securing the safety and well-being of our establishments, together with their visitors.

Unless an immediate response to events is required, staff must not direct cameras at private property, an individual, their property or a specific group of individuals, without an authorisation being obtained for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.

Where appropriate, CCTV footage can be used by BePART Educational Trust institutions to support where appropriate staff and student discipline issues and general facilities management.

CCTV warning signs will be clearly and prominently placed at all external entrances to each institution where CCTV is operational, including entrance gates as coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV (see Item 5 – CCTV Signage). Staff, students and visitors should be made aware that CCTV is in operation for the reasons stated above.

3) CCTV Operation

The CCTV systems are owned and operated by the individual institutions. The Principal/Headteachers have overall responsibility for the CCTV systems. The Trust's IT Director is responsible for the day-to-day operation of the systems – except for third party ownership.

The Trust's IT Team will check and confirm the efficiency of the system on a daily basis and in particular that the equipment is properly recording and that cameras are functional – except for third party ownership.

The following members of staff are authorised to view images captured by the CCTV system:

Trust Wide

- Trust's Leadership Team
- Trust's IT Services Team*
- Trust's Human Resources Team
- Trust's Estates and Health & Safety Team

Individual Institution

- Senior Leadership Team
- Human Resources
- Site Staff
- Any other staff as required to assist in the identification of pupils

* Only the Trust's IT Services team have the ability to burn-off footage via password.

Wherever possible, the CCTV Control Room and the institution's IT Server Room will be one and the same. If this is not possible, the institution needs to take responsibility and ensure steps are taken to prevent authorised access. In the case that the system has been installed in a dual purpose room, all access devices (keyboards & mice) will be removed and access will be via Computer. The Trust's IT Director can discuss this with the individual institution.

All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

4) Third Party Ownership of CCTV

Internal/External Cameras for a member institution may be maintained and operated by a third part (such as PFI maintained buildings) and as such the management, responsibility and operation falls outside the scope of this policy.

5) CCTV Signage

It is a requirement of the Data Protection Act 1998 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. Each institution within BePART Educational Trust is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That CCTV surveillance is in operation in this area and that pictures are recorded
- The purpose of using CCTV
- The details of the organisation operating the system if not obvious

The Trusts IT Director will ensure that each institution is provided with the correct signage.

6) Monitoring & Recording

Monitoring of the live images will be carried out as and when required. The CCTV equipment has the capability of recording all cameras simultaneously throughout every 24hour period.

The system does not have sound recording capability.

Viewing of images will only take place in restricted areas to which other employees will not have access while viewing is occurring. The exception to this is when images are being viewed via a Computer by a designated person above. In this case the monitor will be angled to prevent anyone, other than the operator, viewing the images on the screen.

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators). The data may be used within the school's disciplinary, grievance and appeal procedures and can be viewed as part of any appeals process and will be subject to the usual confidentiality requirements.

Images captured by the system will only be shared with law enforcement agencies where a crime needs to be investigated. Any other requests for images should be refused, except in some very limited circumstances where it may be appropriate to release images to a third party. In such cases the agreement of the institution Principal/Headteacher must be sought before this information is released. A fee may be charged for the provision of this information in line with the Trust's Data Protection Policy – See Subject Access Request below.

Materials or images secured as a result of CCTV will not be used for any commercial purpose or released to the media.

7) Storage and Retention of CCTV Images

CCTV Systems currently store a maximum of 31 days' worth of recorded footage and then automatically overwritten.

Offline retained data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

8) Request for Footage

When a request is made to retrieve footage from the CCTV system, a CCTV Access Request form will need to be completed (Appendix A). The form will be copied into the institutions CCTV Operation File.

Requests from non-BePART Educational Trust employees should be directed to the Data Protection Policy where they can make a subject access request.

9) Siting the Cameras

Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. For example, cameras will not be placed in areas which are reasonably expected to be private such as toilets. Each institution will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

The planning and design of any institutions CCTV system has endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency but it is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage.

The areas covered by CCTV to which this policy refers are within the boundaries of BePART Educational Trust buildings. Cameras may be deployed in a covert manner (see Covert Monitoring below) if requested by the Police, Public Authority or the institutions

Management Team. The Location of CCTV cameras will be included in the institutions CCTV Operation File.

CCTV will not be used in classrooms, except in exceptional circumstances (see Covert Monitoring below). The exception to this is IT Suites which carry a risk of vandalism to expensive equipment.

10) Covert Monitoring

A BePART Educational Trust institution may in exceptional circumstances set up covert monitoring. For example:

- i) Where there is good cause to suspect that an illegal or serious unauthorised action(s) is taking place, or where there are grounds to suspect serious misconduct, which can include vandalism of trust equipment.
- ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

Covert Monitoring may take place in classrooms when circumstance (i) and (ii) are satisfied. Covert Monitoring used in classrooms will never be used to observe or assess a teacher's professional performance, or to contribute to capability proceedings.

Covert monitoring must cease following completion of an investigation.

In these circumstances the approval of the Trust's Chief Executive must be obtained and information logged with the Trust's Data Controller.

11) Subject Access Request

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV. BePART Educational Trust will protect the rights of other individuals whose images may also be captured on CCTV footage requested by obscuring their identity as far as reasonably practical.

Requests for Data Subject Access should be in line with the BePART Educational Trust Data Protection Policy.

12) Liaison

Liaison meetings may be held with all bodies involved in the support of the system.

13) Further Information

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)
- www.ico.org.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998

Appendix A

CCTV Access Request Form