



Lady Mannors School

CCTV Policy

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Through our shared school values, we aim for all students to thrive, feel included and aspire to grow as individuals who contribute to society with empathy, integrity and positivity.

This document will be reviewed annually by the Governors' Finance and Personnel Committee and sooner when significant changes are made to the law.

Guidance from the Department for Education about school policies can be found here: <https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts>

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1. Introduction

- a The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Lady Manners School.
- b The system comprises a number of cameras (see Annex 5) located around the school site. All CCTV recorders are password protected and monitoring is only available to authorised staff.
- c This Policy follows Data Protection guidelines, including guidance from the Information Commissioner's Office and the Biometrics and Surveillance Camera Commissioner.
- d The CCTV system is owned by the school.
- e Authorised Staff
 - Headteacher
 - Senior Leadership Team Members
 - HR Manager
 - Pastoral Support Assistants
 - Year Leader
 - IT Network Manager
 - Facilities Manager

2. Equalities Statement of Intent

Lady Manners School welcomes a diverse population of both students and staff. In order to consolidate and build upon this diversity, equality of opportunity and the absence of unfair discrimination is at the core of all the school's activities. The school will not unfairly discriminate in the recruitment or general treatment of staff or students.

The school is committed to promoting and developing equality of opportunity in all its functions and will seek to do this by:

- communicating its commitment to equality and diversity to all members of the school community;
- maintaining systems for implementation, monitoring, evaluation and review;
- treating acts of discrimination and other contraventions of this policy as a disciplinary offence.

The Governing Board has responsibility for ensuring that the school operates within the legal framework for equality and for implementing the policy throughout the school. In addition, each member of the school community is responsible for preventing unfair discrimination or harassment or victimisation which it is within their control to prevent; and challenging or reporting such inappropriate behaviour if it occurs.

3. Purposes of the CCTV scheme

- (a) To protect the school buildings and their assets
- (b) To increase personal safety and reduce the fear of crime
- (c) To support the law enforcement agencies eg Police in a bid to deter and detect crime
- (d) To assist in identifying, apprehending and prosecuting offenders
- (e) To assist with the safeguarding and supervision of students

The school has identified the following legal bases for processing CCTV footage which will include personal data; UK GDPR Article 6(1)e (public task) and Article 9(2)(g) (substantial public interest) and Data Protection Act 2018 Schedule 1, paragraph 10 (preventing or detecting unlawful acts) and paragraph 36 processing criminal category data for purposes of substantial public interest.

4. Statement of intent

- 4.1 The school will seek to comply with the requirements of the Data Protection Act ("the Act"), the Information Commissioner's Guidance on Video Surveillance and the Biometrics and Surveillance Camera Commissioner "Surveillance Camera Code of Practice".
- 4.2 The school will treat the system and all information, documents and recordings obtained and used as personal data which are protected by the Act.

- 4.3 Cameras will be used to monitor activities within the school to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of members of the school community and members of the public.
- 4.4 Materials or knowledge obtained as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the law enforcement agencies e.g. police. Recordings will never be released to the media for purposes of entertainment.
- 4.5 The planning and design has endeavoured to ensure that the Scheme 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.
- 4.6 Cameras will not record any private premises.
- 4.7 Signs that inform people of the existence of CCTV, as required by the UK GDPR and guidance from the Information Commissioner have been placed at access routes to areas covered by the school CCTV.
- 4.8 A log is kept of Authorised Staff access to Recorded Images (template below)

5. Operation of and Access to the System

- 5.1 The Scheme is administered and managed by the Business Manager in accordance with the principles and objectives expressed in this policy.
- 5.2 Images can be accessed by authorised staff on their office computers which are password protected. Remote access may be used in an **emergency** situation under the following arrangements:
Access should be made via the school's secure system.
The session should be logged out of immediately after viewing the footage for its intended purpose.
Viewing should take place in a controlled environment, not in public spaces such as cafés or pubs.
No footage should be downloaded to the device used for access.
A record of the access should be logged in accordance with the CCTV policy
- 5.3 A live feed for the Visitors and Rutland drives is available in the main reception from the CCTV recorder control console. A live feed is used to monitor behaviour at lunchtime. Live feeds are available to authorised staff for the management of the school, security of the site and safety of staff and students.
- 5.4 The CCTV system will be operated 24 hours each day, every day of the year.
- 5.5 CCTV recordings will be available for a maximum of 40 days unless copied to removable media. After this time any recordings will be automatically overwritten. Where CCTV is copied to be retained for longer periods this will be documented and justified in the Access Log. In this case, the footage will be held in accordance with the School Retention Schedule.

6. Printed and Recording Media Procedures

In the event of an incident requiring footage from the system to be retrieved and stored the following procedure will be followed:

- The details of the incident will be passed to the Headteacher or member of SLT, who will authorise the use of the system by an authorised user.
- The relevant footage will be identified.
- An entry shall be made on the Recorded Image Viewing Log.
- If the footage is required for investigation. The Date and Time of the recorded extract will be registered and stored in a secure place by the IT Manager.
- The footage may only be viewed by Authorised Staff.
- A record of all viewings shall be made, which if required as evidence, may be released to the law enforcement agencies e.g. Police.
- Applications received from outside bodies or Subject Access Requests to view or release records will be notified to the Headteacher.

7. Assessment of the System

- 7.1 The Facilities Manager and IT Manager will check and confirm the screen and cameras are working daily.
- 7.2 Regular reviews of the system's operation will take place and any necessary changes in procedure and camera sighting/position will be implemented.
- 7.3 The Business Manager and DPO will carry out an annual review of the use of CCTV, using the Annual Review Checklist below.
- 7.4 The school will carry out a Data Protection Impact Assessment to review the use of CCTV whenever there is any significant change to the use of the system or the purpose for which it is used.
- 7.5 If out of hours emergency maintenance arises, the Headteacher, Premises Manager or Business Manager will be satisfied of the identity and purpose of contractors before allowing entry.

8. Breaches of the policy (including breaches of security)

- 8.1 Any breach of this Policy by school staff will be initially investigated by the Headteacher, in order for him to take the appropriate disciplinary action.
- 8.2 Any serious breach of this Policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

9. Complaints

Any complaints about the CCTV system will be addressed to the Headteacher and investigated in accordance with the school's complaint Policy.

10. Access by the Data Subject

- 10.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to access copies of data held about themselves, including those obtained by CCTV.
- 10.2 Requests for Data Subject Access will be made in accordance with the Subject Access Request Procedure.

CCTV Annual Review Record

Appendix 1

Review Record	Satisfactory		Problems Identified?	Corrective Action Required / Additional Notes (if relevant)
	Yes (✓)	No (✗)		
The school is registered with the Information Commissioner's Office and the next renewal date recorded.	✓			
There is a named individual who is responsible for operation of the system.	✓			
The problem we are trying to address has been clearly defined and installing cameras is the best solution.	✓			
The CCTV system is addressing the needs and delivering the benefits that justified its use.	✓			
The nature of processing or surveillance equipment has not changed since the last review.	✓			
Clear procedures and policies are in place for CCTV and are up to date with any changes to the system/processing (eg CCTV Policy, CCTV DPIA, Privacy Notices).	✓			
The system equipment produces clear images which law enforcement agencies e.g. police can use to investigate crime and these can easily be taken from the system when required.	✓			
Cameras have been sited so that they provide clear images.	✓			
Cameras have been positioned to avoid capturing images of people who are not visiting the premises.	✓			
There is sufficient suitable signage notifying people that CCTV monitoring is in operation, including our contact details where it might not be obvious that the system is managed by this school	✓			
Information is available to help deal with queries about operation of the system and how individuals can make access requests.	✓			
Sufficient safeguards are in place to protect wireless transmission systems from interception.	✓			
There are sufficient controls and safeguards in place if the system is connected to, or made available across, a computer, e.g. an intranet.	✓			

Review Record	Satisfactory		Problems Identified?	Corrective Action Required / Additional Notes (if relevant)
	Yes (✓)	No (✗)		
Images from this CCTV system are securely stored, where only a limited number of authorised staff have access to them.	✓			
A log is maintained of all access to the system, including names of staff viewing images and whether any images are shared.	✓			
Recorded data 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.	✓			
The process for deleting data is effective and being adhered to.	✓			
Except under the direction of an appropriate public authority (usually police), images will not be provided to third parties, unless the Headteacher has approved the disclosure of the data under the advice of the DPO.	✓			
When information is disclosed, it is transmitted as securely as possible e.g. viewed on school premises, hand delivered/collected in person, a fully tracked postal service etc.	✓			
Staff are trained in security procedures and there are sanctions in place for any misuse of surveillance system information.	✓			
Regular checks are carried out to ensure that the system is working properly and produces high quality and useful data.	✓			
There is adequate protection against any cyber security risks or risks in the event of any hardware being lost/stolen.	✓			
There is a system in place to ensure that any manufacturer recommended CCTV system and equipment updates, especially of security software are regularly sought, applied and checked as properly functioning.	✓			

EXAMPLE CCTV Recorded Image Access Log

Appendix 2

CCTV Recorded Image Access Log					
Authorised Staff Name	Camera Number/Location	Date and Time of recording	Reason for Viewing (e.g. Vandalism, Behaviour incident)	Further Action Taken (e.g. any images/recordings saved or shared?)	Notes- e.g. Authorisation for sharing/retention period for retained images

CCTV OPERATOR AGREEMENT

Appendix 3

People authorised to view the recordings are set out in the CCTV Policy.

I confirm I have read and understood the CCTV Policy and agree to adhere by the rules of the policy as an operator of this system.

In addition, I will update the CCTV Recorded Image Access Log each time I access the system to retain a recording. I will:

- record the reason for viewing any images
- detail any retained images, why these were retained and diarise to review saved images for deletion
- I will ensure any retained images are password protected.
- I understand images including retained images must not be shared with third parties, including staff who are not part of the senior leadership team.
- any shared images must have approval for sharing from the Headteacher.

Name of authorised operator: _____

Signature: _____

Date: _____

I confirm that _____ is an authorised operator of the CCTV system.

Headteacher: _____

Date: _____



**THESE PREMISES ARE
PROTECTED BY 24 HOUR CCTV
RECORDING**

**Images are being monitored for the purpose of public safety,
crime prevention, detection and prosecution of offenders.**

The scheme is controlled by:

Lady Manners School

For further information contact:

THE SCHOOL OFFICE TEL NO: 01629 812671