



**HAMPDEN HOUSE**

# **CCTV Policy**

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Adopted by the Management Committee:

Signed:

Date: November 2018

Chair of the Management Committee

Date for review: November 2020

Person responsible for review: Headteacher

## **1. Introduction**

1.1 Hampden House PRU uses closed circuit television (CCTV) images to reduce crime; to monitor the school premises in order to provide a safe and secure environment for students, staff and visitors; and to prevent the loss or damage to school property and vehicles parked on the site.

1.2 The system comprises 8 fixed external cameras and 2 internal cameras to provide coverage of drive, car park, playground, playing field, rear access to the school block and kitchen, entrance lobby and one student area in the residential section.

1.3 The system does not have sound recording capability.

1.4 The CCTV system is owned and operated by the school, and its deployment is determined by the school's Leadership Team.

1.5 The CCTV display monitor is held in the office of the Head of Care and Health and Social Inclusion Manager. Access to recorded images is restricted to the Headteacher and Senior Leadership Team

1.6 Any changes to CCTV monitoring will be subject to consultation with staff and the Management Committee.

1.7 The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 2018 and the General Data Protection Regulation 2018 (GDPR). This policy outlines the school's use of CCTV and how it complies with both.

1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are advised by the Headteacher in their responsibilities under the CCTV Code of Practice. All employees will be made aware of the restrictions in relation to access to, and disclosure of, recorded images.

## **2. Statement of Intent**

2.1 The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:

[http://www.ico.gov.uk/~media/documents/library/Data\\_Protection/Detailed\\_specialist\\_guides/ICO\\_CCTVFINAL\\_2301.ashx](http://www.ico.gov.uk/~media/documents/library/Data_Protection/Detailed_specialist_guides/ICO_CCTVFINAL_2301.ashx)

2.2 CCTV warning signs will be clearly and prominently displayed to state that CCTV cameras are deployed in and around the school site.

2.3 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.

## **3. Siting the Cameras**

3.1 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. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act and GDPR.

3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which will include indoor and outdoor areas.

3.3 CCTV will not be used in classrooms.

3.4 Members of staff should have access to details of where CCTV cameras are situated.

The exception stated in the Code of Practice is if cameras are placed for the purpose of covert monitoring (see below).

#### **4. Covert Monitoring**

4.1 The school may in exceptional circumstances set up covert monitoring. For example:

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

4.2 In these circumstances authorisation must be obtained from the Headteacher. If the suspected activity involves the headteacher, then authorisation should be sought from the Chair of the Management Committee.

4.3 Covert monitoring must cease following completion of an investigation.

4.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilets.

#### **5. Storage and Retention of CCTV images**

5.1 Recorded 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.

5.2 All retained data will be stored securely on the designated hard drive with restricted access.

#### **6. Access to CCTV images**

6.1 Access to recorded images will be restricted to those staff authorised to view them (see 1.5), and will not be made more widely available.

6.2 A record will be kept by the Headteacher, recording any incidents or searches. This register will include the following:-

- the purpose of any searches and whether the search was successful or not
- who carried out search

- persons present (particularly when reviewing).
- date, start and end time of the incident.
- date and time of the review
- any other relevant information

If an incident or search relates to the headteacher a record will be kept by the Chair of the Management Committee.

## **7. Subject Access Requests (SAR)**

7.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

7.2 All requests should be made in writing to the Headteacher. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

7.3 The school will respond to requests within 40 calendar days of receiving the written request and fee.

7.4 A fee of £10 will be charged per request or as otherwise agreed with the Senior Leadership Team.

7.5 The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

## **8. Access to and Disclosure of Images to Third Parties**

8.1 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).

8.2 Requests should be made in writing to the Headteacher. If the recorded data involves the Headteacher, the request should be made in writing to the Chair of the Management Committee.

8.3 The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

## **9. Complaints**

9.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.

## **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.gov.uk](http://www.ico.gov.uk)
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018
- General Data Protection Regulation 2018