



# **The John Fisher School**

## **CCTV Policy**

**Responsible:** Governors' Resources Committee

**Next Review Date:** June 2021

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## **1. Introduction**

The John Fisher School is fully committed to the safety of its staff, students and visitors and to this extent has invested in the security of its buildings and facilities. The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at The John Fisher School. Common CCTV systems are based around digital technology and therefore need to be treated as information that will be processed under the General Data Protection Regulations 2018. The person ultimately responsible for data protection within The John Fisher School is the Headteacher.

The system comprises a number of fixed cameras located both internally and externally around the school site. All cameras may be monitored and are only available for use by approved members of staff.

The CCTV system is owned by the school and will be subject to review on an annual basis.

## **2. Objectives of the CCTV System**

The objectives of the CCTV system are:

1. To protect the school buildings and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption.
2. To increase the personal safety of staff and students and reduce the fear of physical abuse, intimidation and crime.
3. To support the police in a bid to deter and detect crime.
4. To assist in identifying, apprehending and prosecuting offenders on the school site.
5. To protect members of the public and private property.
6. To assist in the use and management of the school buildings and site on a day to day basis.

## **3. Statement of Intent**

1. The CCTV system will be registered with the Information Commissioner under the terms of the General Data Protection Regulations 2018 and will seek to comply with the requirements both of the General Data Protection Regulations 2018 and the Commissioner's Code of Practice.
2. The school will comply with the General Data Protection Regulations 2018, whether it be information, recordings or downloads which relate to the CCTV system.
3. Cameras will be used to monitor activities within the school buildings, the car parks and other areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the occupants within the school, together with its visitors.
4. Staff have been instructed to ensure that static cameras will not focus on private homes, gardens and other areas of private property.
5. Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation from the

Headteacher being obtained. Any such request and authorisation will be recorded in the Specific Filming Request Log.

6. Materials or knowledge secured as a result of the CCTV system will not be used for any commercial purpose. Downloads will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Downloads will never be released to the media for purposes of entertainment.

7. The planning and design of the existing 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.

8. Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the school's CCTV.

#### **4. Operation of the System**

The system will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in this Policy.

1. The day to day management will be the responsibility of the School Business Manager.
2. The CCTV system will be operated 24 hours each day, every day of the year.
3. Images will be deleted after 30 days except when they are being used as part of an investigation in which case they will be retained until the investigation has concluded.

#### **5. CCTV System**

1. The School Business Manager 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.

2. Access to the CCTV will be strictly limited to the members of staff approved by the Headteacher.

3. Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation from the Headteacher being obtained. Any such request and authorisation will be recorded in the Specific Filming Request Log.

4. The CCTV system may generate a certain amount of concern from members of the public. Any concern expressed by a member of the public should be referred to the Headteacher. If permission is granted by the Headteacher, the member of the public must be accompanied throughout the visit by a member of staff.

5. Any site visit by a member of the public may be immediately curtailed if the operational requirements of the CCTV System make this a necessity.

6. Other administrative functions will include maintaining hard disc space, filing and maintaining occurrence and system maintenance logs by the School Business Manager.

7. In the event of an emergency which requires an immediate contact with an emergency service, the emergency procedures identified in the Health and Safety Policy (page 5 'Staff' points 8 and 9 and page 6 'Accident, Incident, Violence, Near Miss Reporting') will be adhered to

<http://fluencycontent2-schoolwebsite.netdna-ssl.com/FileCluster/TheJohnFisherSchool/MainFolder/our-school/policies/Health--Safety-Policy.pdf>

## **6. Liaison**

1. Liaison meetings may be held with all bodies involved in the support of the CCTV system i.e. maintenance contractors, approved staff, police etc.

## **7. Monitoring Procedures**

1. Camera surveillance may be maintained at all times for monitoring purposes.
2. Out of hours the system will connect to an external Remote Video Receiving Centre (RVRC) in the event of a security alarm activation.

## **8. Video Download Procedures**

1. Recordings may be viewed by the police for the prevention and detection of crime. Permission to do this will be given by the Headteacher.
2. A record will be maintained of the release of downloads to the police or other authorised applicants on the Subject Access Request Log.
3. Viewing of downloads by the police must be recorded in writing and on the Subject Access Request Log. Requests by the police can only be actioned under the terms of the General Data Protection Regulations 2018.
4. Should a download be required as evidence, a copy may be released to the police under the procedures described in the above paragraphs of this Policy. Downloads will only be released to the police on the clear understanding that the disc remains the property of the school, and both the disc and information contained on it are to be treated in accordance with this Policy. The school also retains the right to refuse permission for the police to pass to any other person the disc or any part of the information contained thereon.
5. Applications received from parents/carers or outside bodies (e.g. solicitors) to view or release downloads will be referred to the Headteacher. In these circumstances, downloads will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee of £100 can be charged in such circumstances.
6. Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the CCTV Policy.

## **9. Breaches of the Policy (including breaches of security)**

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.
2. Any serious breach of the Policy will be immediately investigated, and an independent investigation carried out to make recommendations on how to remedy the breach.

## **10. Assessment of the Scheme and CCTV Policy**

Performance monitoring, including random operating checks, may be carried out by the approved persons.

## **11. Complaints**

1. Any complaints about the school's CCTV system should be addressed to the Headteacher.
2. Complaints will be investigated in accordance with Section 9 of this Policy.
3. The Headteacher, or other delegated Senior Leader, will usually respond to a verbal or written complaint within 24 hours of receiving it, but may well need longer to fully investigate the circumstances leading to the complaint. Parents will be kept informed of time scales involved. Timescales need to be flexible to meet particular circumstances however a response will normally be provided within 5 school days in accordance with the School's Complaints Policy <http://fluencycontent2-schoolwebsite.netdna-ssl.com/FileCluster/TheJohnFisherSchool/MainFolder/our-school/policies/Complaints-Policy.pdf>

## **12. Access by the Data Subject**

1. The General Data Protection Regulations 2018 provide Data Subjects (individuals to whom "personal data" relates) with a right to data held about themselves, including those obtained by CCTV.
2. Requests for Data Subject Access should be made in writing to the Headteacher and will be recorded on the Subject Access Request Log.

## **13. Public Information**

Copies of this Policy will be available to the public, by making a request to the Headteacher. A copy of this Policy will be located on the Z drive for information purposes for members of staff and on the school's website.

## **14. System Maintenance and Monitoring**

1. The system will be maintained in accordance with the General Data Protection Regulations 2018.
2. The system will only be maintained and monitored by companies which carry the relevant accreditation from the Security Systems and Alarm Inspection Body (SSAIB) or National Security Inspection (NSI).
3. It will be the responsibility of the School Business Manager to liaise with the maintaining company for the reporting of faults on the system and any changes to the site which may affect the operation of the system.

4. It will be the responsibility of the School Business Manager to arrange regular system reviews with the maintaining company.

## **15. Summary of Key Points**

- This CCTV Usage Policy will be reviewed on an annual basis.
- The CCTV system is owned and operated by the school.
- The CCTV system will not be manned in out of school hours; only external cameras will be monitored reactively by the nominated RVRC.
- The CCTV system cannot be accessed by parents/carers or visitors/ members of the public.
- Liaison meetings may be held with the police and other bodies.
- Copies of downloads may only be viewed by authorised staff and the police.
- Copies required as evidence will be properly recorded, witnessed and packaged before copies are released to the police.
- Copies will not be made available to the media for commercial or entertainment reasons.
- Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the CCTV Policy.
- Any breaches of this Policy will be investigated by the Headteacher. An independent investigation will be carried out for serious breaches.
- Breaches of the Policy and recommendations will be reported to the Headteacher.
- The system will be maintained on a regular basis by an approved contractor.