



WOODBIDGE HIGH SCHOOL

CCTV Policy

CONTENTS

1. INTRODUCTION.....	2
2. OBJECTIVES OF THE CCTV SYSTEM	2
3. STATEMENT OF INTENT	2
4. SYSTEM MANAGEMENT	3
5. ANNUAL MAINTENANCE CONTRACT.....	3
6. DOWNLOADED CCTV VIDEO DVD PROCEDURES	4
7. ASSESSMENT OF THE SYSTEM AND CODE OF PRACTICE	5
8. COMPLAINTS.....	5
9. ACCESS BY THE DATA SUBJECT	5
10. PUBLIC INFORMATION.....	5
11. SUMMARY OF KEY POINTS	5
12. REFERENCES INFORMATION.....	6

1. INTRODUCTION

- 1.1. The purpose of this Policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at Woodbridge High School, hereafter referred to as 'the school'.
- 1.2. The system comprises a number of fixed, static dome and pan-tilt-zoom cameras located in and around the school site. Live access to CCTV is provided to authorised user staff only. Previously recorded images are accessible to the Data Controller and System Manager (or by delegation to the ICT support team). They may grant access to others as provided in this policy.
- 1.3. This Policy follows Data Protection Act guidelines.
- 1.4. The School Policy will be subject to review every two years, to include consultation as appropriate with interested parties.

2. OBJECTIVES OF THE CCTV SYSTEM

- 2.1. To protect pupils, staff and visitors.
- 2.2. To increase personal safety and reduce the fear of crime.
- 2.3. To protect the school buildings and assets.
- 2.4. Without prejudice, to protect the personal property of pupils, staff and visitors, though responsibility remains with the owners.
- 2.5. To support the police in preventing and detecting crime.
- 2.6. To assist in identifying, apprehending and prosecuting offenders.
- 2.7. To assist in managing the school.

3. STATEMENT OF INTENT

- 3.1. The CCTV system will seek to comply with the requirements of both of the Data Protection Act and the Information Commissioner's Code of Practice.
- 3.2. The school will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.
- 3.3. Cameras will be used to monitor activities within the school and its grounds to identify criminal activity actually occurring, anticipated, or perceived. It will be used for the purpose of securing the safety and wellbeing of the pupils, staff and school together with its visitors.
- 3.4. The system has been designed to deny observation on adjacent private homes, gardens and other areas of private property.
- 3.5. Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.
- 3.6. Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police.

- 3.7. Images will never be released to the media for purposes of entertainment.
- 3.8. The system has been designed to 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.
- 3.9. Warning signs, as required by the Code of Practice of the Information Commissioner, will be clearly visible on the site.

4. SYSTEM MANAGEMENT

- 4.1. The system will be administered and managed by the School Business Manager who will act on behalf of the Data Controller, in accordance with the principles and objectives expressed in the policy.
- 4.2. The day-to-day management will be the responsibility of the Senior ICT Technician who will act as the System Manager.
- 4.3. Live access to CCTV footage will be granted to assigned users only within the school. The Data Controller and System Manager will have access to previously recorded images.
- 4.4. The CCTV system will be operated 24 hours each day, every day of the year.
- 4.5. The System Manager will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional. The System Manager will be responsible for liaising with the service contractor concerning day-to-day CCTV issues.
- 4.6. The System Manager must liaise with the Data Controller concerning any request by a member of staff to view recorded images. As a rule, requests to view CCTV images will only be granted to Leadership Group Members, Year Co-ordinators and the Behaviour Support Team. Where any doubt exists access will be refused and the matter referred to the headteacher.
- 4.7. Details of **ALL** requests must be recorded in the log retained by the System Manager, including time/date of access and details of images viewed. A reference number is given to the member of staff requesting access.
- 4.8. When access is granted, a file with a clip of the specific images required will be saved by the System Manager to a limited access location. This will be retained for a period of six months if not used by the Police or other third party requester.
- 4.9. Downloaded files for viewing by members of staff investigating specific incidents will be stored in a limited access location for 7 days, after which they will be deleted. Further access can be obtained up to 30 days by submitting the reference number to the System Manager.
- 4.10. If downloaded images are required for longer than 7 days, for example where they may lead to an exclusion or criminal investigation, they can be retained for a maximum of 30 days at the request of a member of the Leadership Group. In this case, they will be retained on an encrypted hard drive.

5. ANNUAL MAINTENANCE CONTRACT

- 5.1. The school has an annual maintenance contract with an external provider.
- 5.2. The current chosen contractor has remote access to our cameras and is able to identify malfunctioning CCTV cameras remotely.

6. DOWNLOADED CCTV VIDEO DVD PROCEDURES

There may be occasions when the school is required to provide external bodies (e.g. police, solicitors, parents, etc) with CCTV evidence. This may require recordings to be kept beyond the timescales set out above when they are used for internal investigation. If recordings are to be kept for provision to external bodies, this must be organised as follows:

- 6.1. In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any downloaded video DVD used to record events from the hard drive must be prepared in accordance with the following procedures:
 - 6.1.1. Each downloaded video DVD must be identified by a unique mark, date, time and camera number.
 - 6.1.2. Before use, each downloaded video DVD must be cleaned of any previous recording.
 - 6.1.3. The System Manager will register the date and time of ANY downloaded video DVD, including its reference.
 - 6.1.4. Downloaded video DVD required for evidential purposes must be arranged confidentially and discreetly by the System Manager, then dated and stored in a separate secure evidence store. If a downloaded video DVD is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.
 - 6.1.5. If a downloaded video DVD is archived the reference must be noted.
- 6.2. Images may be viewed by the police, and recorded in writing, for the prevention and detection of crime and by authorised school management.
- 6.3. A record will be maintained of the release of any downloaded video DVD to the police or other authorised applicants.
- 6.4. Should images be required as evidence, a copy may be released to the Police under the procedures described in this policy. Images will only be released to the Police on the clear understanding that the downloaded video DVD (and any images contained thereon) remains the property of the school, and downloaded video DVD (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the Police to pass the downloaded video DVDS (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded video DVD this will be produced from the secure evidence store, complete in its sealed bag. The Police, or other law enforcement agency, must supply the purpose for which the footage is required. This information will be retained by the school.
- 6.5. The police may require the school to retain the downloaded video DVD for possible use as evidence in the future. Such downloaded video DVD will be properly indexed and securely stored until this is needed by the police.
- 6.6. Applications received from outside bodies (e.g. solicitors, police, parents, etc) to view or release images will be referred to the school's Leadership Group.
- 6.7. Permission will need to be obtained from all those visible in any footage before it may be viewed by any body other than the Police, unless there is demonstrable evidence that it would not be in the interests of the data subject to seek consent.

7. ASSESSMENT OF THE SYSTEM AND CODE OF PRACTICE

- 7.1. Performance monitoring, including random operating checks, may be carried out by the Systems Manager and the Data Controller.

8. COMPLAINTS

- 8.1. Any complaints in relation to the school's CCTV system should be addressed to the Data Controller.

9. ACCESS BY THE DATA SUBJECT

- 9.1. 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.
- 9.2. Requests for Data Subject Access should be made to the Systems Manager and then authorised by the Data Controller.

10. PUBLIC INFORMATION

- 10.1. Copies of this policy will be available to staff and the general public on the school website.

11. SUMMARY OF KEY POINTS

- 11.1. This Policy will be reviewed every year.
- 11.2. The CCTV system is owned and operated by Woodbridge High School.
- 11.3. The CCTV system and images are not available to visitors except under circumstances as outlined in this policy.
- 11.4. Liaison meetings may be held with the police and other bodies if required.
- 11.5. Downloaded media will be properly indexed, stored and destroyed after appropriate use, in accordance with the Data Protection Act.
- 11.6. Images may only be viewed by authorised school officers and the police.
- 11.7. Downloaded media required as evidence will be properly recorded, witnessed and packaged before copies are released to the police.
- 11.8. Downloaded media will not be made available to the media for commercial or entertainment purposes.

12. REFERENCES INFORMATION

The Data Protection Act

[http://www.ico.org.uk/for_organisations/data_protection/topic_guides/~media/documents/library/Data Protection/Detailed_specialist_guides/ICO CCTVFINAL_2301.pdf](http://www.ico.org.uk/for_organisations/data_protection/topic_guides/~media/documents/library/Data_Protection/Detailed_specialist_guides/ICO_CCTVFINAL_2301.pdf)

The Commissioners Act

<http://www.legislation.gov.uk/ukpga/1998/29/schedule/11/crossheading/northern-ireland>

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Policy Reviewer: Steven Hogan (Headteacher)

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