# Upton-by-Chester High School

## CCTV Policy

| Policy Link | |
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| Governor | D Rowlands |
| DPO | |

| To | Date |
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# 1. Introduction

The purpose of this Policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at Upton-by-Chester High School.

The system is a closed IP system that comprises 120 static cameras, 2 cameras have the ability to Pan, Zoom or Tilt (PTZ) remotely. No Audio is recorded by the CCTV system. The system is in operation 24 hours a day, 365 days a year.

The CCTV system is owned and operated by the school. Its deployment is determined by the Headteacher and the ICT Strategic Manager.

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

This policy is based on:

## 1.1 Legislation

UK General Data Protection Regulation

Data Protection Act 2018

Human Rights Act 1998

European Convention on Human Rights

The Regulation of Investigatory Powers Act 2000

The Protection of Freedoms Act 2012

The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)

The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004

The School Standards and Framework Act 1998

The Children Act 1989

The Children Act 2004

The Equality Act 2010

### 1.2 Guidance

Surveillance Camera Code of Practice (2021)

### 1.3 Definitions

Surveillance: the act of watching a person or a place

CCTV: closed circuit television; video cameras used for surveillance

Covert surveillance: operation of cameras in a place where people have not been made aware they are under surveillance

## 2. Objectives

This policy aims to set out the school's approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on school property.

### 2.1 Statement of Intent

Upton-by-Chester High School uses closed circuit television (CCTV) recordings and Live Images to:

- To Maintain a safe environment.
- To protect the school buildings and assets.
- To protect pupils, staff and visitors.
- Without prejudice, to protect the personal property of pupils, staff and visitors.
- To increase personal safety and reduce the fear of crime.
- Helping to ensure the welfare of pupils, staff and visitors.
- Deter anti-social acts against persons and property.
- To assist in identifying and apprehending offenders.
- Assist the police in identifying persons who have committed an offence.
- To assist in managing the school.

The CCTV system will not be used to:

- Encroach on an individual's right to privacy.
- Monitor people in spaces where they have a heightened expectation of privacy.
- Pursue any other purposes than the ones stated above.

The School will ensure that the location of equipment is carefully considered and all captured data is processed in a responsible, secure manner.

The introduction of, or changes to, CCTV monitoring are subject to consultation with the Headteacher and ICT Strategic Manager.

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy.

CCTV is not used for routine monitoring of employee performance / teaching. However, footage may be used in disciplinary investigations, specific allegations of gross misconduct or safety breaches.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

CCTV warning and operation signs, inline with the ICO code of practice, are clearly and prominently placed around the site.

The School has carried out various Data Protection Impact Assessments (DPIA) for its CCTV coverage. This is reviewed annually to ensure the necessity and proportionality of the system. The CCTV DPIA can be found here

The CCTV system has been designed for maximum effectiveness and efficiency. The school cannot however guarantee that every incident will be detected or covered and 'blind spots' may exist in the areas covered.

The system is commissioned, administered, and managed by the School who will control access and availability of recorded and live images, in accordance with the principles and objectives expressed in this policy.

# 3. Location of Cameras

## 3.1 CCTV coverage of Public Areas

The location of cameras is a key consideration at Upton-by-Chester High School. The School endeavours to select locations for the installation of CCTV cameras which are least intrusive and protect the privacy of individuals. Cameras placed to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property. Where this is not possible privacy masks are used. (Appendix 8.1)(Appendix 8.2)

Cameras are sited so they only capture images relevant to the purposes for which they are installed as described above. Care will be taken to ensure that reasonable privacy expectations are not violated.

## 3.2 CCTV coverage of Toilet Areas in the School

The School wishes to protect some of its toilet area estate against vandalism, bullying and anti-social behaviour. The placement of cameras in these areas is taken extremely seriously so as to ensure that users of the facilities have a reasonable right to privacy. Cameras are positioned to face away from cubicle doors and urinals. Privacy masking software is utilised to

permanently block out any areas that exceed communal areas. Mirrored images within the environment are also considered in the placement of devices.

The toilets in the Canteen, A-Block, B-Block, C-Block, D-Block, E-Block and the Modular build have CCTV installed within. The locations of the cameras and the view of the cameras is displayed below (Appendix 8.1)(Appendix 8.2)

# 4. Covert Monitoring

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

- 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;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from the Headteacher in direct consultation with the school's Data Protection Officer (DPO). Covert monitoring must cease following completion of an investigation.

# 5. Storage, Retention and Access of CCTV images

## 5.1 Access to CCTV footage

All authorised users are required to satisfy themselves of the identity of any person wishing to view images or access the system and the legitimacy of the request. Where any doubt exists access will be refused.

Access to the IP based cameras is via secured logins. Each IP Camera connects to a Network Video Recorder (NVR) which is stored in a restricted area accessible only by key lock. Unauthorised access to this area is not permitted at any time. NVRs located in this room are only attached to a monitor for administration purposes.

The only people with access to the room for technical purposes are the Strategic ICT manager and ICT Technician.

Outside of the restricted area access to the system to view Live and Recorded images from public areas is via IP through a bespoke software package, this package is controlled via secured logins given to authorised personnel only and installed on specific machines (Appendix 8.3).

The machine located in the ICT Support Office is only authorised to be used by The Headteacher, members of SLT, Pastoral Staff and the ICT Support Team.

Authorised personnel with live access only have access to cameras as agreed by the Headteacher dependent on their job role. i.e. 6th Form staff have access to the 6th Form area cameras. The Headteacher, 6th Form Staff, Premises Staff, and the ICT Support Department are the only areas with this access.

The CCTV may randomly be monitored from secure designated PCs (Appendix 8.3).

The only authorised personnel with live and record access to this system are, the ICT Strategic

Manager, the ICT Technician and the Premises Manager.

Downloaded event data is available to the Headteacher, SLT, Pastoral Teams, ICT Support Team. Other access may also be granted to appropriate persons dictated by the event itself, such as HOD's.

The system as a whole is supported by an authorised Third Party Contractor, who install new equipment, network points and support the NVRs. This contractor has no remote connection to the site.

NVRs and all stored data associated with are classed as 'non mission critical'. To this extent no backups are made of the system.

Raw Recorded data is retained for 30 days after which the system overwrites itself.

To protect the integrity of the recordings, ensure their evidential value and to protect the rights of the people whose images have been recorded, downloaded data acquired for purposes described in this policy, is uploaded to a secure location for a period appropriate to the handling of the data.

## 5.2 CCTV Video Recording of Pupil Toilet Handwashing / Communal Areas in the School

Recorded data from within communal toilet areas, may be downloaded from the system for purposes defined in 2.1.

Recorded data from within communal toilet areas, may be shared with other members of staff if appropriate and in line with purposes outlined in 2.1, such as for identification purposes.

Cameras covering communal toilet areas are only accessible via the NVR or CCTV control computer setup in the ICT Support office.

The NVR for cameras covering communal toilet areas is separate from the main NVR and is located in a secure room with limited authorised access as detailed above. The system is secured with a solo admin account separate from the main system.

Cameras covering communal toilet areas may be monitored by the Strategic ICT Manager, IT Technician, Headteacher, SLT or Pastoral Teams at any time. However monitoring will only be carried out in exceptional circumstances such as locating a missing pupil always inline with the objectives set out in 2.1.

The School has carried out a Data Protection Impact Assessments (DPIA) for CCTV coverage in these areas. This is reviewed annually to ensure the necessity and proportionality of the system. The CCTV DPIA for Pupil Toilet Handwashing / Communal areas can be found here

## 5.3 General

If data from the CCTV may be used within the school's discipline and grievance procedures, it will be subject to the usual confidentiality requirements of those procedures.

Disclosure of information from CCTV must always be consistent with the purpose(s) for which the system was established. For example the School may show individuals who are the subject of the surveillance and their Parents/Carers captured images. The School may also show or

disclose images to Law Enforcement Agencies. The school will ensure that disclosure is fair to the individuals concerned and that privacy intrusion to any third party individuals will be minimal.

Information obtained through the CCTV system may only be released externally when authorised by the Headteacher and in accordance with the Data Protection Act 2018.

The School will cooperate with Law Enforcement Agencies when adequate legal justification is provided. If the Police require footage for the prevention or detection of crime, they must provide a formal written request (e.g., a Data Protection Act Schedule 2, Part 1(2) Exemption Form) signed by a senior officer. The School reserves the right to verify the identity of the officer and the validity of the request before releasing data. In cases where the request is complex or unclear, the School may seek legal advice before proceeding.

## 6. Subject Access Requests

Any subject access request will be dealt with inline with the Schools subject access request policy located on the School website.

Individuals whose information is recorded have a right to be provided with that information or, if they consent to it, view that information.

SARs must include the name of the requester, date, time and location of where the footage was captured.

Requests for disclosure of recorded images should be by following the procedure outlined on the School website.

The School will make every effort to safeguard the identities of third parties through redaction (e.g., blurring). However, if a Subject Access Request is deemed manifestly unfounded or excessive, the School may charge a reasonable fee to cover administrative costs, or refuse the request entirely. In such cases, the School will provide a clear justification to the requester.

## 7. Complaints

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: www.ico.org.uk

# 8. Appendix

## 8.1 Locations of Cameras




## 8.2 Views of CCTV in Toilet Areas

A Block





B Block









C Block










D Block




E Block






Canteen Views





Science Block



School Car Park



## 8.3 PCs with CCTV Access

- Headteacher
- ICT Office PC
- ICT Strategic Manager
- ICT Technician
- Premises Manager
- Premises Team PCs
- 6th Form Office PCs