

# Upton-by-Chester High School

## CCTV Policy



Policy Link	
SLT	Lee Cummins
Governor	Paul Ivison

To	Date
Committee Finance and Buildings	10 May 2023
Full Governing Body	05 July 2023
Next Review	10 May 2026

Website	Yes/No
School (Public)	Yes
Staff Area (Internal)	Yes

*'Learning to shape the future'*

## 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 School complies with the Information Commissioner's Office (ICO) document 'In the picture: A data protection code of practice for surveillance cameras and personal information' (2014) to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at: <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

The CCTV Scheme is registered with the Information Commissioner's Office under the terms of the Data Protection Act 1998. The use of CCTV and the associated images is covered by the Data Protection Act 1998 and the General Data Protection Regulation 2016. This policy outlines the school's use of CCTV and how it complies with the legislation.

The system is a closed IP system that comprises 120 static cameras. No Audio is recorded by the CCTV system.

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.

## Objectives of the CCTV System

Upton-by-Chester High School uses closed circuit television (CCTV) recordings and Live Images 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 fear of crime.
- 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.

## Statement of Intent

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

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 e.g. CCTV will not be used for monitoring employee performance.

The School has and will make every effort to position cameras so that their coverage is restricted to the school premises, which includes outdoor areas.

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

the site.

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

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.

Live and recorded images are available to authorised personnel as dictated by the Headteacher.

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.

CCTV placed in toilet areas are on the whole used only to review footage after an event, such as vandalism.

The public circulation areas in toilets may occasionally be viewed in real time if justifiable reasons are met, such as locating a missing pupil. This is only possible on the CCTV monitoring station located in ICT Support.

The CCTV is randomly monitored from secure designated PCs by authorised staff.

Raw recorded data will be available to the Headteacher, the SLT, the ICT Support Team and the Premises Manager.

The CCTV system is in operation 24 hours each day, every day of the year.

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.

## Location of Cameras

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 to protect the privacy of individuals. Cameras placed so as 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.

### CCTV Video Monitoring and Recording of Public Areas in the School may include the following:

- **Protection of school pupils, staff and visitors:** Protection against threatening behaviour, theft, personal injury
- **Protection of school buildings and property:** The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services.
- **Monitoring of Access Control Systems:** Monitor and record restricted access areas at entrances to buildings and other areas.
- **Verification of Security Alarms:** Intrusion alarms, exit door controls, external alarms.
- **Video Patrol of Public Areas:** Parking areas, Main entrance/exit gates.
- **Criminal Investigations (carried out by Law enforcement):** Robbery, burglary and theft surveillance.
- **Management of the School:** To understand the flow of the School and uphold School policies.

### CCTV Video Recording 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. To this end cameras will only be positioned to cover sink and communal areas within the toilets and will never show areas such as urinals or inside cubicles. A privacy mask is also applied on cameras where necessary to ensure these areas are not viewable. Mirrored images within the environment are also considered in the placement of devices.

The toilets in E- Block, the Canteen, A- Block, B-Block and C-Block have CCTV installed within. The locations of the cameras and the view of the cameras is displayed below.

## **Storage, Retention and Access of CCTV images**

Access to the IP based cameras is via secured logins. Each IP Cam 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.

For the most part NVRs are located in the room without an attachment to a monitor. The only time a monitor is attached to the physical unit is during technical works and is removed immediately after works have concluded.

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

IT and Business teachers also have access to the room but are authorised to use only to control the air conditioning units located in their classrooms.

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.

Authorised personnel with live access only to limited cameras are, The Premises Staff, The Pastoral Team, and the Support Manager.

Authorised personnel with live and record access to this system are, the ICT Strategic Manager, The ICT Technician, The Premises Manager.

Outside of the restricted area access to the system to view Live and Recorded images from toilet areas is via IP through a bespoke software package, this package is controlled via secured logins given to authorised personnel only.

Only the ICT Strategic Manager has administrator access to this system, with the ICT Technician having access only to the CCTV Control Computer located in the ICT Support Office. Access to Toilet footage and procedures are covered later in this document.

The system as a whole is supported by Topological Solutions, who install new equipment, network points and support the NVRs. Topological have access to the Admin account for the entire system. Topological can only access the system when on site under strict supervision as no remote support is available.

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

Raw Recorded data is retained for an undefined time period when the system overwrites itself dependent on its available storage.

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.

## **System Management and Access to CCTV images and disclosure**

### **CCTV Video Monitoring and Recording of Public Areas in the School**

The system covering public areas may be monitored at any time on site by those users listed previously in line with this policy and the systems stated use.

Non Sensitive requested footage is stored outside of the system using the Schools Google G Suite in a Team Drive labelled 'CCTV Footage'. This folder is accessible by the Strategic ICT Manager, IT Technician, Headteacher, Deputy Headteachers, SLT, Heads of Year and Pastoral Managers.

Non sensitive recorded data may also be shared with other members of staff if appropriate and in line with this policy, such as for identification purposes.

The NVR for the publicly recorded areas is located in a secured room with only authorised access permitted.

### **CCTV Video Recording of Toilet Areas in the School**

Non sensitive recorded data from within toilet areas, such as vandalism, anti social behaviour etc is downloaded from the system for purposes defined in this policy. This folder is accessible by the Strategic ICT Manager, IT Technician, Headteacher, Deputy Headteachers, SLT, Heads of Year and Deputy Heads of Year.

Non sensitive recorded data may also be shared with other members of staff if appropriate and in line with this policy, such as for identification purposes.

Toilet cameras are only accessible via the NVR or CCTV control computer setup in the ICT Support office.

The NVR for this system is separate from the main NVR, 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.

Toilet footage may be monitored by the Strategic ICT Manager, IT Technician, Headteacher or Deputy Headteachers at any time. Monitoring of toilets will only be carried out in exceptional circumstances such as locating a missing pupil.

### **General**

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.

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 GDPR. Any requests for CCTV recordings/images from Law enforcement will be fully recorded. Legal advice may also be sought if any such request is made. If a law enforcement authority is seeking a recording for a specific investigation, the Law Enforcement authority may require a warrant and accordingly any such request made by a Law Enforcement agency should be requested in writing and the school will immediately seek legal advice.

## Subject Access Requests

Any SAR will be dealt with inline with the Schools SAR 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.

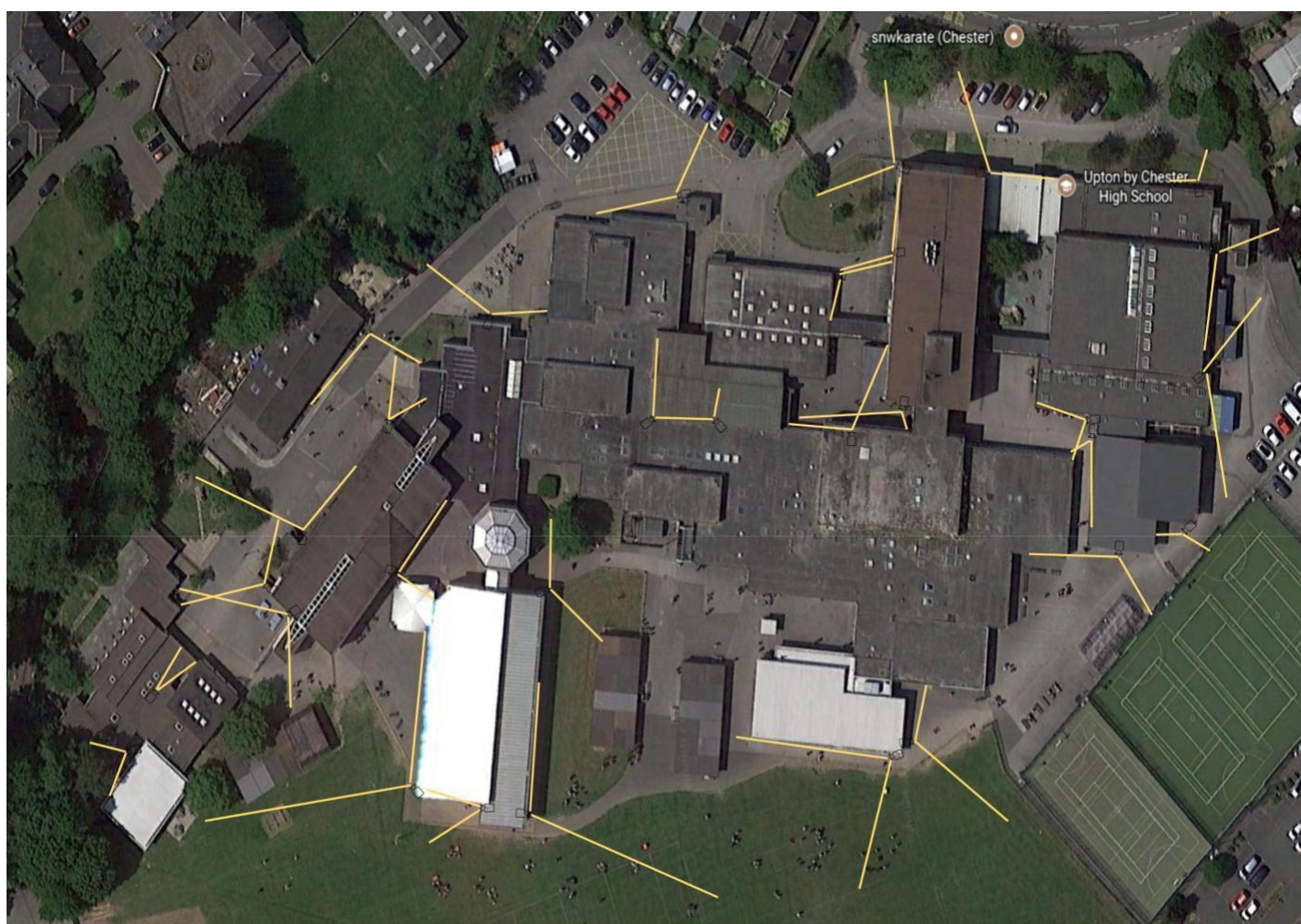
Requests for disclosure of recorded images should be by following the procedure outlined on the School website.

## 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](http://www.ico.org.uk) Data Protection Act 1998 Surveillance Camera Code of Practice, Home Office. June 2013

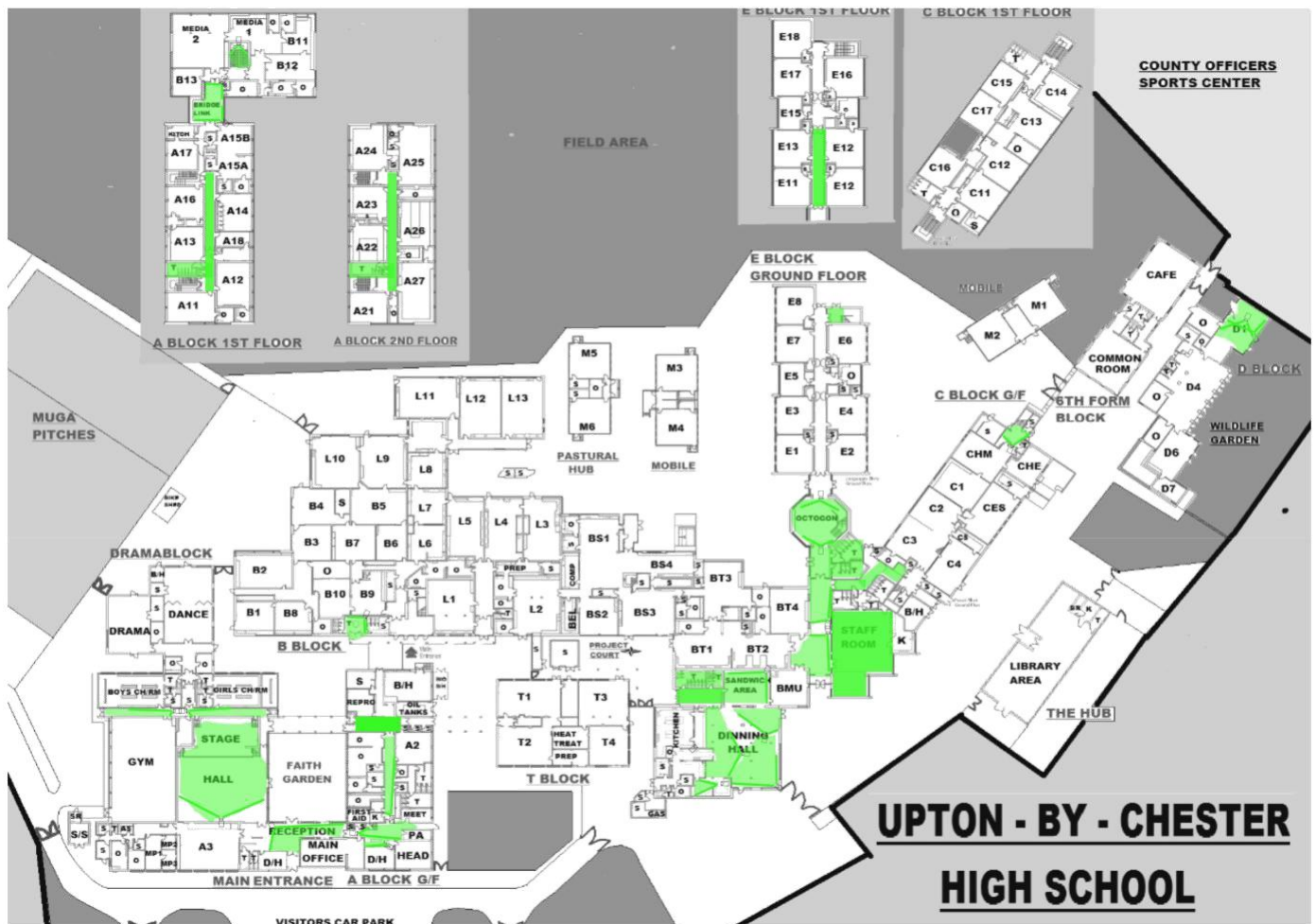
## Appendix

### Locations of Cameras





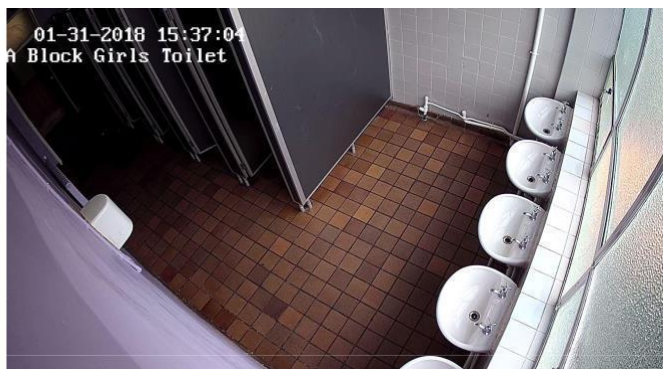
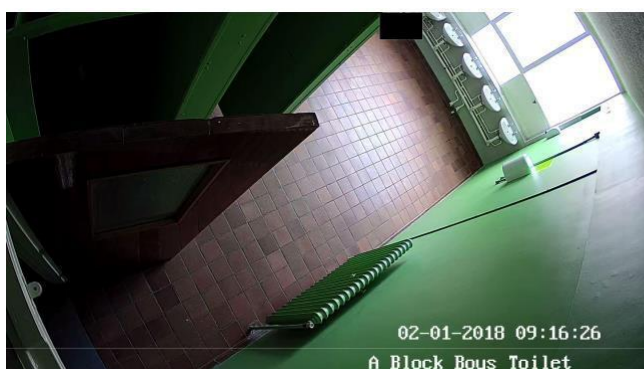




## Location of Network Video Recorders

## Views of CCTV in Toilet Areas

### A Block Views



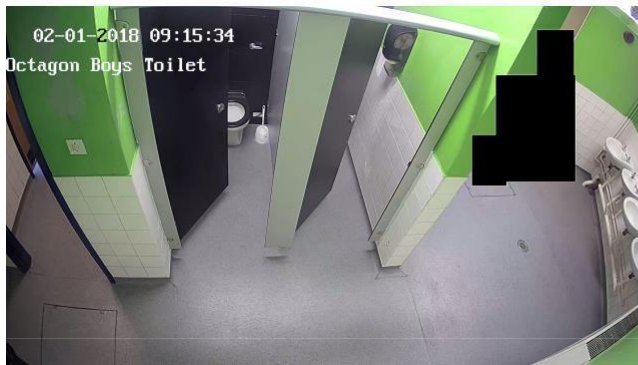
## Canteen Views







## Octagon Views



## B Block Sink



