

Closed Circuit Television (CCTV) Policy - OCS (Facilities Management)

1. Introduction

The purpose of this document is to regulate the management, operation and use of CCTV systems in our school.

1.1 Epinay School uses closed circuit television (CCTV) images as it has decided it is required;

- as part of the school's processes for monitoring of student behaviour to ensure a safe and orderly environment for its students and staff.
- as part of the school's processes for identifying perpetrators of vandalism.
- to provide evidence where staff, students, parents or third parties may be subject to potential malicious or deliberately inaccurate accusations.
- As an aid to members of staff with responsibility for behaviour management.
- For the prevention and detection of crime and to provide a safe and secure environment for users of the site.
- To monitor personal safety for site supervisors, caretakers, cleaners etc.
- To monitor site safety and security.
- As an effective deterrent for crime.
- As a means of crime reduction and discouraging trespass.
- As a method of controlling access.
- An aid to site management in monitoring incorrect parking, manoeuvring vehicles, delivery arrivals etc.
- to assist in the investigation of accidents, incidents and near misses.

1.2 The system comprises of internal and external cameras.

1.3 The system has sound recording capability in some instances although this has been disabled and use is not permitted.

1.4 The CCTV system in the main building and grounds is owned by Lantern Fire and security and operated by both OCS Group (Facilities Management body) and school. Whilst the CCTV system in the school annex

and surrounding grounds is owned by the school and operated by both OCS Group (Facilities Management body) and school.

- 1.5 The CCTV is monitored centrally from the Facilities Management office by OCS Group's (Facilities Management body) Site Manager Lyndsey Tully

Access to live CCTV footage will be granted to assigned users only within the school (see below). The Data Controller and System Manager have the authority to grant access to previously recorded images where this request is in keeping with the objectives of the CCTV policy. Where either live or recorded footage is accessed, it must be logged with the System Manager.

Recorded footage may only be viewed by a member of school staff for the purposes of identified within this policy, and only with the permission of the Headteacher.

- 1.6 The introduction of, or changes to, CCTV monitoring will be shared with staff and the School community.
- 1.7 The School's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 1998 and GDPR. This policy outlines the School's use of CCTV and how it complies with the Act.
- 1.8 All authorised operators and employees approved to access images are made aware of the procedures that need to be followed when accessing the recorded images. All employees are aware of the restrictions in relation to storage of, 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.
- 2.2 CCTV warning signs are clearly and prominently placed at all external entrances to the School, including main staff/pupil and visitor entrances.
- 2.3 The planning and design of the system minimises any invasion of privacy and ensures that the Scheme gives maximum effectiveness and efficiency, however it is not possible to guarantee that the system will fully meet this brief or detect every single incident taking place in the areas of coverage.
- 2.4 CCTV data will not be used in any aspect of performance management, unless with the written consent of the employee concerned.

3. Siting of Cameras

- 3.1 Cameras are sited so they only capture images relevant to the purposes for which they are installed (described above) and care is taken to ensure that civil rights and privacy 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, cameras will be regularly checked to ensure they have not been moved or tampered with in any way. Maps of the camera positions are available from the Site Office and the Director of Operations.

3.2 The School will make every effort to position cameras so that their coverage is restricted to the School's premises, which may include outdoor areas.

3.3 CCTV will not be used in classrooms with the exception of the agreed use of equipment designed to provide professional development opportunities, which will only be used with the permission of all involved (see IRIS Protocol at appendix 3 for more detail).

3.4 Members of staff upon request will have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring (see section 4).

3.5 Only suitably competent contractors with the relevant knowledge and experience will be employed to install and maintain the equipment.

4. Storage and Retention of CCTV images

4.1 Recorded data will not be retained for longer than is necessary than to meet the purposes of recording them, and will be deleted/erased appropriately and in line with approved procedures for the School as documented in appendix 1. 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.

4.2 All retained data will be stored securely. Access will be limited to named operators/staff only (see appendix 1) whose access is authorised by the Headteacher.

5. Access to CCTV images

5.1 Access to recorded images will be restricted to those staff authorised to view them by the Headteacher/ Chair of Governors.

5.2 A list of staff authorised to view images from this CCTV system will be held by the School, and listed in appendix 1.

6. Subject Access Requests (SAR)

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

6.2 All requests must be made in writing to the Headteacher. Individuals submitting requests for access will have to provide sufficient information to enable the footage relating to them to be identified & isolated. For example, date, time and location.

6.3 The School will respond to requests within the time period specified in the most recent legislation relating to subject access requests.

6.4 At the Headteachers' discretion, a fee may be charged per Subject Access Request.

6.5 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. Where images of other individuals are on the CCTV footage their permission will be sought before access is allowed.

7. Access to and Disclosure of Images to Third Parties

- 7.1 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).
- 7.2 Requests should be made via email stating reason, dates and times to Director of Operations. Verbal requests will not be permitted.
- 7.3 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.

8. Complaints

- 8.1 Complaints and enquiries about the operation of CCTV within the School should be directed to the Headteacher in the first instance.
- 8.2 Failure of authorised operators/staff to comply with the requirements of this policy may lead to disciplinary action under the school's disciplinary procedure.

9. Review

This policy will be reviewed every 3 years, or sooner if required due to changes in legislation or statutory guidance (e.g. adoption in UK of General Data Protection Regulation).

Policy approved by Governors: February 2024

Review date: February 2025

Appendix 1 – Specifics of Operation

The School's CCTV system and the images produced by it are controlled in line with our policy, our data controller will notify the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998).

The School has considered the need for using CCTV and has decided it is required;

- as part of the school's processes for monitoring of student behaviour in order to ensure a safe and orderly environment for its students and staff.
- as part of the school's processes for identifying perpetrators of vandalism.
- to provide evidence where staff, students, parents or third parties may be subject to potential malicious or deliberately inaccurate accusations.
- As an aid to members of staff with particular responsibility for behaviour management.
- For the prevention and detection of crime and to provide a safe and secure environment for users of the site.
- To monitor personal safety for site supervisors, caretakers, cleaners etc.
- To monitor site safety and security.
- As an effective deterrent for crime.
- As a means of crime reduction and discouraging trespass.
- As a method of controlling access.
- An aid to site management in monitoring incorrect parking, manoeuvring vehicles, delivery arrivals etc.
- to assist in the investigation of accidents, incidents and near misses

It will not be used for other purposes. We conduct a periodic review of our use of CCTV.

The system will be administered and managed by specific staff as outlined below;

Role within the CCTV policy.	Name	Job title	Employer	Specific responsibilities within the management and administration of the CCTV policy.
System Manager/Site Manager	Lyndsey Tully	Facilities Manager	OCS Group	<ul style="list-style-type: none">• Carry out daily checks to confirm the system equipment is functioning as intended.• Responsible for informing the Headteacher of any faults on the system.

				<ul style="list-style-type: none"> • Ensure any faults on the system equipment is reported for repair without delay. • Responsibility for full operation of the CCTV system outside of school hours (including during Hub hours). • Responsible for ensuring that where recorded footage is accessed it is logged appropriately. • Limit access to recorded images to those staff authorised to view them by the Headteacher. • Liaison with the Data Controller concerning any request by a member of staff/member of the public/police/solicitors etc to view or receive a copy of recorded images.
Data Protection Officer	Data Services Team	DPO	Chapman Data & Information Services	<ul style="list-style-type: none"> • Responsibility for EPINAY SCHOOL compliance with the requirements of the DPA. • Determine the 'purposes for which and the manner in which personal data is to be processed'. • Ultimate responsibility for ensuring that any Data Processors who work on their behalf until such time as data are disclosed. • Responsibility for the compliance (with DPA) of staff processors of any data across the organisation.

				<ul style="list-style-type: none"> • Responsible for addressing any requests for access to recorded images. • Address/investigate any complaints in relation to the correct use of the CCTV system.
Senior Leadership Team	See App 1	SLT	Epinay School	<ul style="list-style-type: none"> • Granted access to live and recorded images as a tool for monitoring and maintaining appropriate student behaviours. • Gathering evidence in relation to reports of (what could be reasonably described as) inappropriate behaviour.

The following have been granted access to live CCTV footage as a tool to support the aims of the school outlined in appendix1.

Person	Post and Organisation	Notes
Lyndsey Tully	Site Manager OCS	
Rachael Carson-White	OCS Contracts Manager	
Christopher Rue	Head Teacher	
Emma Price	Senior Deputy Head Teacher	
Lynne Murphy	Deputy Head Teacher/DSL	
Kate Simpson	Assistant Head Teacher	
Nicole Harrison	Lead Practitioner	
Maria Catley-White	Lead Practitioner	
Carly Coutakis	Lead Practitioner	
Dianne Mountain	School Business Manager	
Sandra Stephenson	Head's PA	
Ronice Jopling	Multi-Agency Key Worker	
Joanne Woods	Health and Safety Manager (LA)	

Appendix 2 – CCTV Signage

It is a requirement of the Data Protection Act 1998 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.