

CCTV POLICY

1. Introduction

- 1.1. This policy is written in accordance with the General Data Protection Regulation (“GDPR”) which came into force on 25 May 2018 and the Data Protection Act 2018.
- 1.2. Bedale High School (BHS) uses Closed Circuit Television (“CCTV”) across its site for the following purposes:
 - 1.2.1. To assist in providing a safe and secure environment for all students, staff and visitors.
 - 1.2.2. To assist in the prevention and detection of crime and to assist law enforcement with investigations and criminal proceedings.
 - 1.2.3. To assist in the prevention and detection of theft and criminal damage to all assets within BHS.
 - 1.2.4. All cameras will be used to support positive behaviour in all schools and providing visual evidence of any incident as well as crime prevention and detection, including bullying.
- 1.3. This policy is intended to provide protection against the misuse of CCTV systems within BHS.
- 1.4. The CCTV system will never be used as part of any Performance Management process.

2. CCTV Systems

- 2.1. BHS uses a variety of CCTV systems across the site. These systems consist of both analogue and IP cameras.
- 2.2. The cameras used on all systems consist of fixed cameras and movable cameras. These may also include cameras with the ability to zoom.
- 2.3. CCTV is also in place on the school minibus. This system records to a separate facility on the school minibus and can only be accessed by authorised members of staff.
- 2.4. At the discretion of the Headteacher, Bedale High School may also install ‘dummy’ cameras – these do not have the functionality to record any data (image or audio) and are installed for the purposes of discouraging incidents.

Camera Locations

- 2.5. CCTV cameras are located both inside and outside of the school buildings:
 - 2.5.1. All cameras will be visible and in prominent areas.
 - 2.5.2. Cameras will not routinely be placed in offices or classroom. They may, however, be in place in some specialist learning spaces where staff supervision is low, or the nature of the students in the space creates a higher level of risk. In these instances, staff, students and visitors will be informed and clear signage displayed.
 - 2.5.3. Cameras will not be installed in areas where additional privacy is expected such as changing rooms or toilets, however, sink areas may be monitored where appropriate and where the cameras cannot see into any areas of additional privacy.
 - 2.5.4. BHS will do everything possible to ensure any area outside of the grounds of the school establishment is not visible on the cameras or recordings.
 - 2.5.5. Signage will be displayed around the site ensuring staff, students and visitors are aware of the CCTV monitoring and how to find out more information.

3. Covert Recordings

- 3.1. The school may in exceptional circumstances set up covert monitoring where there is no less intrusive way of investigating. For example:
 - 3.1.1. 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;
 - 3.1.2. Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- 3.2. In these circumstances, authorisation must be obtained in writing from the Co-Chair of Governors.
- 3.3. Covert monitoring must cease following completion of an investigation.

4. Storage of Data

- 4.1. All data is stored directly on the Network Digital Video Recorder (NDVR) which is physically secured and accessible only to authorised members of staff.
- 4.2. Images are retained on the NDVR for no longer than 14 calendar days and no less than 5 calendar days. In the event of a Hard Disk or NDVR Failure, BHS will attempt to recover footage, but the same data retention would apply.

- 4.3. If BHS has reason to believe there is a significant threat to a site's security and may require recorded footage to be retained for longer than 14 calendar days, this will require approval from the Co-Chair of Governors and must have a specified end date.
- 4.4. Any images required longer than BHS retention period can be electronically held for review and must be deleted as soon as there is no longer basis to retain the data.
 - 4.4.1. Where the school is legally required to retain images and data for longer than BHS' retention period for the purpose of evidential records, the school shall do so in a secure manner.

5. Privacy

- 5.1. The installation or relocation of any camera will first go through an impact assessment (usually discussed in a Senior Leadership Team meeting) to ensure full compliance with this policy. Minutes of this discussion will be kept.

6. Access Management

- 6.1. Access to the CCTV recordings is controlled via assigned user accounts, which can only be used by designated members of staff.
- 6.2. The physical NDVR is kept securely locked away, preventing physical access.

7. Viewing of CCTV

- 7.1. Any viewing of footage is logged recording a minimum of date, time, person(s) accessing the footage, person supporting the viewing, reason for reviewing the footage, footage reviewed and a copy of the electronic authorisation form.
- 7.2. Viewing of CCTV will require an access form to be completed by the member of staff needing to review footage and then approved by the Headteacher prior to any footage being viewed (**Please see Appendix 1**). These forms must be retained.
 - 7.2.1. In the event that the Headteacher is the requestor, a report must be provided to the Co-Chair of Governors at the earliest opportunity to state that the CCTV has been viewed and outline the reasons.
- 7.3. Viewing of the images should only be done for the purpose of items 1.2.1, 1.2.2, 1.2.3, 1.2.4.

7.4. Routine access to the CCTV system by the following is authorised to enable them to carry out their daily duties.

7.4.1. IT Services – Maintenance of the physical system and software to ensure continued and reliable functionality.

7.4.2. Site Team – Access to cameras to maintain site security and daily functionality tests.

7.4.3. Contracted CCTV Monitoring Company – to monitor and maintain the security of the academy sites out of school hours.

7.5. **Viewing of live images**

7.5.1. Should only be done in line with item 3.1 or where there is suspicion that improper conduct may be carried out at a particular time.

7.5.2. Should only be in a controlled space with authorised personnel and monitors should not be left on unattended.

7.5.3. The privacy of staff and students going about their normal legitimate business must be respected at all times.

7.5.4. Viewing of live images should only be used where there is an immediate safeguarding risk to students or staff on site.

7.5.4.1. The use of access control entry systems is excluded. Entry systems will be used by members of staff to authorise visitor entry to the trust sites, no footage is recorded and is only live for the duration of the interaction between the visitor and the member of staff.

8. Disclosure

8.1. Images will only be disclosed as part of a Subject Access Request.

8.1.1. Images will only be supplied to the subject where either all subjects in the footage have consented to the disclosure, or the subject is the only person in the recording.

8.2. Images will not be disclosed where the disclosure will prejudice any criminal enquires.

8.3. All requests for disclosure will be recorded, where a request is declined the reason will also be recorded.

9. Complaints

- 9.1. Complaints regarding the procedures laid down in this policy will follow that set out in the school Complaint's Policy.
- 9.2. Complaints relating to information handling may be referred to the Information Commissioner.

10. Monitoring, Evaluation and Review

- 10.1. This policy will be reviewed annually
- 10.2. Any amendments to legislation may instigate a review of this policy at any time.

