



Tibshelf Community School

CCTV (Tibshelf Policy)

Policy Status	Date	CHAIR OF COMMITTEE	Minute No:
Accepted by P&F	15/04/2015	B Chittenden	P&F/15/19
Ratified by Full Governors	29/04/2015	Shaun Byrne	GB/15/22
Approved by PP+F	27/04/2016	Mick Allen	PP+F/05/04.16
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Review Period: 1 Year



The use of CCTV in School

This policy is based on the best practice as detailed in the ICO (Information Commissioner's Office) CCTV Code of Practice revised edition 2008 which is available to download from www.ico.gov.uk/upload/documents/library/data_protection/detailed_specialist_guides/ico_cctvfinal_2301.pdf

This code covers the use of cctv systems that view or record images of individuals so as to

- see what an individual is doing, for example walking in the school
- potentially take some action in relation to an individual, for example in handing the images over to the police to investigate a crime and as such these images may be used as evidence

Impact assessment

1. Tibshelf Community School will use the images to monitor the presence of unauthorised people on the site; people who create a disturbance, damage property, assault people and who appear to break the law.
2. Tibshelf Community School will take responsibility for these images under the Data Protection Act (DPA).
3. The benefits to Tibshelf Community School are an increase in the security of legitimate users of the school and a reduction of damage and a decrease of disruptive behaviour in public places in the school.
4. CCTV will only be used in public areas and will not be used to monitor teaching and will only provide images.

The ARC has Audio facility on two cameras.

5. We will monitor its use and seek the views of those who regularly use the site.
6. The system will be operated in accordance with the law operating at the time.
7. The system will only be used where there is a pressing need and will be proportionate to the problem it is designed to deal with.

Ensuring effective administration

1. The Headteacher will have responsibility for control of the images and decisions on how they are used, and in his absence any member of the SLT will take on this role.
2. Tibshelf Community School is the data controller and will notify the Information Commissioner's Office (ICO) of this fact in respect of the cctv images collected.
3. Only employees of Tibshelf Community School will process the images captured by the on-site cctv.

4. The Headteacher, or their representative will be responsible for ensuring that the above procedures are followed.
5. The Headteacher, or their representative will carry out proactive checks on a regular basis to ensure that these procedures are being complied with.

Selecting and siting the cameras

The locations for the cameras have been selected so as to ensure that appropriate images are collected in accordance with the aims stated earlier. They will not be used to monitor teaching staff as they teach.

Equipment chosen

The equipment has been chosen so as to give clear and therefore useful images of people on the site. These images will be stored for a limited period and then overwritten/deleted. No sound recording facility will be employed on any CCTV cameras.

The ARC has audio facility on two cameras and is looking at increasing this to nine cameras with audio addition.

Storing and viewing the images

The images will be stored on the system and be accessible by the Network Manager, Site Managers, PPCs, SLT and the Headteacher. If an image is requested, and the request is a valid one, the Network Manager or their nominated representative will download the required images for the user. If appropriate, the suggested fee will be levied (which at the moment is £10 maximum). The images will be viewed in the caretakers' office so the caretakers can view the site security, especially when they are the only ones in the building. It will only be possible to see sufficient detail when close to the monitors so that people are aware of the CCTV use but not who is being observed.

The Head of ARC Faculty also has limited access to cameras that relate to that department. The Head of ARC also has facility to download images and sound from the ARC cameras.

Disclosure

This will be in accordance with the Data Protection Act (DPA) and will take into account the rights of the individuals viewed on the images and any requests under the Freedom of Information Act (FOI).

To ensure that the CCTV system continues to comply with the Data Protection Act (DPA) and the code's requirements in practice, if requested we will:

- tell people how they can make a subject access request, who it should be sent to and what information needs to be supplied with their request;
- give them a copy of this code or details of the Information Commissioner's Office (ICO) website; and

- tell them how to complain about either the operation of the system or failure to comply with the requirements of this code.

Staff using the CCTV system or images will be trained to ensure they comply with this code. In particular, they will know:

- what the organisation's policies are for recording and retaining images
- how to handle the images securely
- what to do if they receive a request for images, for example, from the police
- how to recognise a subject access request and what to do if they receive one

All images will be protected by sufficient security to ensure they do not fall into the wrong hands. This includes technical, organisational and physical security. For example we will ensure that:

- sufficient safeguards are in place to protect wireless transmission systems from interception
- the ability to make copies of images restricted to appropriate staff
- where copies of images are disclosed they are safely delivered to the intended recipient
- that rooms where images are stored are secure
- that relevant staff are trained in security procedures and they understand the sanctions that may be used against staff who misuse CCTV images
- all relevant staff are aware that they could be committing a criminal offence if they misuse CCTV images

Any documented procedures which we produce following on from this code are added as a working appendix and will be reviewed regularly (annually), by the Headteacher or their nominated representative. This is to ensure the standards established during the setup of the system are maintained.

Similarly, there will be an annual review of the system's effectiveness to ensure that it is still doing what it was intended to do. If it does not achieve its purpose, it will be stopped or modified. The following questions will form the basis of this review.

- Is information available to help deal with queries about the operation of the system and how individuals may make access requests?
- Does the information include our commitment to the recommendations in this code and include details of the ICO if individuals have data protection compliance concerns?
- Is a system of regular compliance reviews in place, including compliance with the provisions of this code, continued operational effectiveness and whether the system continues to meet its purposes and remains justified?
- Are the results of the review recorded, and are its conclusions acted upon?

Appendix 1

The Data Protection Act 1998: data protection principles

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless-
 - (a) at least one of the conditions in Schedule 2 is met, and
 - (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

This is not a full explanation of the principles. For more general information, see our Legal Guidance¹.

1 The ICO's "Data Protection Act 1998 Legal Guidance" is available on the ICO website: www.ico.gov.uk.

Appendix 2

Checklist for users of limited CCTV systems monitoring premises

This CCTV system and the images produced by it are controlled by the Headteacher of Tibshelf Community School who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998)¹.

Tibshelf Community School governors have considered the need for using CCTV and have decided it is required for the prevention and detection of crime, safe working practice and for protecting the safety of its users.