



CCTV policy

Review Date: Spring 2021

Policy reviewed by Local Governing Body
March 2019

Signed

Edward Moores
Chair of Governors

THE BLUE COAT SCHOOL
Egerton Street, Oldham. OL1 3SQ

1. Introduction

The purpose of this Policy is to regulate the review, management, operation, and use, of closed circuit television (CCTV) at Blue Coat School. CCTV is in use to:

- increase personal safety of students, staff and visitors, and reduce the fear of crime
- monitor and minimise unauthorised and inappropriate vehicle access
- assist in managing the school e.g. vandalism, fire alarms, assaults
- protect the school buildings and their assets
- support the Police in a bid to deter and detect crime and identify offenders

This Code follows Data Protection Act guidelines and will be subject to review annually to include consultation as appropriate with interested parties.

2. The system

The CCTV system is owned by the school and comprises 34 fixed cameras located around the school site, 5 internally and 29 externally (See Appendix 1A for detailed list Appendix 2 for site map). All cameras are monitored from the Site Team. The centralised system is only available to designated Site Team staff and members of the Senior Leadership and Management Team or their authorised nominee/s.

3. Statement of intent

- 3.1. The CCTV Scheme will be registered annually by the Data Manager with the Information Commissioner under the terms of the Data Protection Act 2018 and will endeavour to comply with the requirements of the Data Protection Act, General Data Protection Regulation (GDPR) and the Commissioner's Code of Practice. The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.
- 3.2. Cameras will be used to monitor activities within the school and its play, car park, and other public areas, for the purpose of securing the safety and well-being of the pupils, staff and visitors and to identify criminal activity actually occurring, anticipated, or perceived.
- 3.3. Staff have been instructed that static cameras are not to focus on private homes, gardens or other areas of private property.
- 3.4. Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. CD images/disks will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. CD images/disks will never be released to the media for purposes of entertainment.
- 3.5. Planning design and installation has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.
- 3.6. Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the school CCTV including entrance gates, car parks and recreational spaces see list of notices in Appendix 1B.

4. Operation of the system

- 4.1. The Scheme will be administered and managed by the Headteacher's nominee, in accordance with the principles and objectives expressed in the code.
- 4.2. The day-to-day management will be the responsibility of both the Senior Leadership & Management Team (SLMT) and the Site Manager during the day and the Site Team out of hours and at weekends.
- 4.3. The CCTV information will only be accessed by SLMT members or their authorised nominee or the Site Team.

4.4. The CCTV system will be operated 24 hours each day, every day of the year.

5. **System Equipment & Control**

- 5.1. The Site Manager or his nominee will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.
- 5.2. Access to the CCTV equipment will be strictly limited to the SLMT their nominee & the Site Team.
- 5.3. Unless an immediate response to events is required, staff in the CCTV Control Room will not direct cameras at an individual or a specific group of individuals.
- 5.4. Visitors and other contractors wishing to enter the Site Team Office will be subject to particular arrangement as outlined below.
- 5.5. Site Team Members must satisfy themselves over the identity of any visitors to the Office and the purpose of the visit. Where any doubt exists access will be refused.
- 5.6. The system may generate a certain amount of interest. It is vital that operations are managed with the minimum of disruption. Casual visits to view information will not be permitted. Visitors must first obtain permission from the SLMT or Site Manager or his assistant and must be accompanied throughout the visit.
- 5.7. Any visit may be immediately curtailed if prevailing operational requirements make this necessary.
- 5.8. If out of hours emergency maintenance arises, the Site Team representative must be satisfied of the identity and purpose of contractors before allowing entry.
- 5.9. A visitor's book will be maintained at school reception. Full details of visitors including time/date of entry and exit will be recorded.
- 5.10 Other administrative functions will include maintaining the CCTV equipment hard disc space and system maintenance logs.
- 5.11 Emergency procedures will be used in appropriate cases to call the Emergency Services.

6. **Liaison**

Liaison meetings may be held with all bodies involved in the support of the system e.g. police.

7. **Monitoring procedures & Staff Responsibilities**

- 7.1. Camera surveillance will be maintained at all times.
- 7.2. The Site Team Office computer has software installed to enable access to and monitoring of CCTV pictures. Images are continuously recorded and stored on the school computer connected Network Video Recorder (NVR).
- 7.3. The Headteacher, SLT and SLMT have software access from their PCs to review and investigate incidents as necessary.
- 7.4. Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with school policies and procedures and must be authorised by the Headteacher.

8. Image storage and sharing procedures

- 8.1. The images are stored on a school CCTV Network Video Recorder, monitored in the Site Team office, and retained for a period of 10 days after which they are automatically over written. If images are required for evidential purposes, the following procedures for their access, use and retention will be strictly adhered to:
 - 8.1.1. The images required will be transferred to a disk which will be placed in a sealed envelope, witnessed, signed by the site team manager or assistant, dated and stored in a separate and secure safe, in the main Administrative Office, until collected.
 - 8.1.2. Each disk will be identified by a unique reference number.
 - 8.1.3. The disk used will be new or cleaned of any previous recording.
 - 8.1.4. If the disk is archived at a later date, the reference number will be noted.
 - 8.1.5. All disks made will be recorded in the CCTV Log which is maintained by the Site Manager
- 8.2. Disks may be viewed by the Police for the prevention and detection of crime.
- 8.3. A record will be maintained in the CCTV Log of the release of disks to the Police or other authorised applicants.
- 8.4. Viewing of disks by the Police will be recorded in writing and in the log book. Requests by the Police can only be actioned under Part 3 of the Data Protection Act 2018.
- 8.5. Should a disk be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1 (i) of this Code. Disks will only be released to the Police on the clear understanding that the disk remains the property of the school, and both the disk and information contained on it are to be treated in accordance with this code. The school also retains the right to refuse permission for the Police to pass to any other person the disk or any part of the information contained thereon. On occasions when a Court requires the release of a disk copied from the CCTV system this will be produced and kept secure and made available as required.
- 8.6. The Police may require the school to retain the stored disks for possible use as evidence in the future. Such disks will be properly indexed and properly and securely stored in the Main Office school safe until they are needed by the Police.
- 8.7. Applications received from outside bodies to view or release disks will be referred to the Headteacher. Requests from e.g. solicitors will normally be met where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order.

9. Access by or on behalf of the Data Subject

- 9.1. The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate, and their parents, guardians or authorised carers) with a right to data held about themselves, including those obtained by CCTV.
- 9.2. Requests for Data Subject Access should be made to the Headteacher. In exceptional circumstances still images may be approved and commissioned by the Headteacher and may be provided as per 8.1.(i) with the images of other pupils and adults obscured to prevent identification and inappropriate disclosure of their personal information.

10. Breaches of the code (including breaches of security)

10.1 Any breach of the Code of Practice by school staff will be investigated by the Headteacher or her nominee and could lead to disciplinary action including dismissal.

10.2 Any serious breach of the Code of Practice will be immediately investigated and where appropriate an independent investigation carried out to make recommendations on how to remedy the breach and determine if the ICO should be notified.

11. Assessment of the scheme and code of practice

Performance monitoring, including random operating checks, will be carried out by the Director of Operations.

12. Data Retention

Recordings are made 24x7 and captured on the school's NVR system where they are retained for 10 days before being overwritten.

13. Public information

Copies of this Code of Practice will be available to the public via the school website or from the School Office or Headteacher.

14. Complaints

14.1 Any complaints about the school's CCTV system should be addressed to the Headteacher.

14.2 Complaints will be investigated in accordance with Section 9 of this Code.

15. Summary of Key Points

15.1. The CCTV system is owned and operated by the school.

15.2. This Code of Practice will be reviewed every year.

15.3. The Site Team Office will not be staffed out of school hours.

15.4. CCTV images may only be viewed by authorised Site Team, staff Senior Leadership Team members or their nominee, and the Police.

15.5. Students will only be permitted to view CCTV in exceptional circumstances as required and determined by the headteacher.

15.6. The Site Office is not open to visitors except by prior arrangement and with approval.

15.7. Liaison meetings may be held with the Police and other bodies.

15.8. Moving images required as evidence will be properly recorded on disk, witnessed and packaged before copies are released to the police.

15.9. In exceptional circumstances where stills images are authorised and commissioned by the school and made available to individuals in response to individual requests, they will have other individual's images obscured to protect privacy.

15.10. Disks will not be made available to the media for commercial or entertainment use.

15.11. Disks will be disposed of securely using the schools confidential waste arrangements which results in the disks being melted.

15.12. Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with academy policies and procedures and be authorised by the Headteacher. The Data Protection Officer provides additional information if required.

15.13. Breaches of the code and remedies will be reported to the Headteacher who will, if necessary, refer serious breaches to the ICO via the Data Protection Officer.

15.14. Any breaches of this code will be investigated by the Headteacher. An independent investigation will be carried out for serious breaches and reported to the ICO

Appendix 1A: Log of camera types & locations

No	Type	Location	Coverage
External camera locations			
1	Fixed	Lodge	Front door
2	Fixed	Lodge	Main drive up
3	Fixed	Lodge	Side door
4	Fixed	Lodge	Main front gates
5	Fixed	HSM	HSM gates & car park (NE corner)
6	Fixed	HSM	HSM gates & car park (NW corner)
7	Fixed	HSM	HSM west path
8	Fixed	HSM	HSM east car parking
9	Fixed	BC	East path
10	Fixed	BC	South elevation
11	Fixed	BC	LE fox garden & LE west
12	Fixed	LE	South path
13	Fixed	LE	S/O entrance & south path
14	Fixed	LE	Front terrace south
15	Fixed	LE	Cycle park
16	Fixed	MM	Grass mound
17	Fixed	MM	Back pitch & HE rear gulley
18	Fixed	MM	Back pitch towards PT
19	Fixed	MM	Committee room roof & hsm path
20	Fixed	PT	Back pitch & HE rear gulley
21	Fixed	PT	Back pitch towards MM
22	Fixed	PT	Mezz steps & PT gates
23	Fixed	HE	Back pitch towards shaw st
24	Fixed	HE	Hall roof
25	Fixed	AK	PT rear gates & rear of kitchens
26	Fixed	AK	KH car park
27	Fixed	AK	GT & back drive
28	Fixed	AK	YR 10 lockers
29	Fixed	AK	Yr 10 lockers
30	Fixed	AK	Yr 10 lockers
31	Fixed	AK	HE front
32	Fixed	PS	Front terrace
33	Fixed	PS	GT front
34	Fixed	PS	PS south & sculpture
35	Fixed	PS	Main drive & front gates
36	Fixed	PS	PS side door
37	Fixed	GT	GT west & JT
38	Fixed	GT	JT main entrance
39	Fixed	GT	GT south & cage
40	Fixed	GT	GT south & construction slab

Internal camera locations			
41	Fixed	LE	Toilet doors upper floor
42	Fixed	LE	Toilet doors lower floor
43	Fixed	MM	Toilet doors lower floor
44	Fixed	HE	Reception & main entrance

45	Fixed	BC	Upper west entrance
46	Fixed	BC	Lower west entrance
47	Fixed	BC	Lower east entrance
48	Fixed	PS	Boys toilet door & corridor
49	Fixed	PS	Girls toilet door & corridor
50	Fixed	PS	Undercroft toilet & office doors & corridor
51	Fixed	JT	Toilet doors & main entrance corridor
52	Fixed	GT	Boys toilet door & lockers
53	Fixed	GT	Yr 11 social space
54	Fixed	AK	Boys toilet door & corridor top floor
55	Fixed	AK	Girls toilet door & corridor top floor
56	Fixed	AK	Boys toilet door & corridor middle floor
57	Fixed	AK	Girls toilet door & corridor middle floor
58	Fixed	AK	Boys toilet door & corridor bottom floor
59	Fixed	AK	Girls toilet door & corridor bottom floor

Appendix 1B: CCTV Declaration Notices – Locations

- Main entrance
- Restaurant Entrance
- Hogan Steel Mills Building Entrance

Appendix 2: CCTV Site Plans



