



## Closed Circuit TV (CCTV) Policy

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## Document Control

### **Summary of Changes, Document Author, Owner, Reviewers and Approvers**

<b>Version:</b>	<b>Version Date</b>	<b>Nature of Change</b>
V1.0	18/03/19	Document created

### **Document Change Approvers**

<b>Name</b>	<b>Title</b>
Mark Norris	Information Security Manager
Gayle Adam	Head Teacher and Data Protection Officer

### **Document / Change Reviewers**

	<b>Title</b>
Mark Norris	Information Security Manager

### **Document Review Plans**

This document will be reviewed and updated if necessary as defined below:

- As required to correct or enhance information content
- Following changes to the ISO 9001/Q91 quality system standards
- Following any organisational changes or restructuring
- Following an annual review

### **Document Distribution**

This document is automatically distributed to all change approvers after an update and upon request.



## Overview

This Policy Document encompasses all aspects of security surrounding the use of closed circuit television (CCTV) by Step by Step. All members of staff must read this document in its entirety and acknowledge that they have read and understand this policy in full. This document will be reviewed and updated on an annual basis, or when relevant, to include newly developed security standards into the policy and will be distributed to all staff members and contractors as applicable. It may also be shared with any visitor requesting to review the policy.

## Introduction

- 1.1 Step by Step uses (CCTV) and the images produced to prevent or detect crime and to monitor the premises and grounds in order to provide a safe and secure environment for its pupils, staff and visitors, and to prevent loss or damage to Step by Step property.
- 1.2 The system comprises a number of fixed and dome cameras.
- 1.3 The CCTV system is owned and operated by Step by Step, the deployment of which is determined by the Head Teacher and/or Board of Governors.
- 1.4 The system does not currently have sound recording capabilities.
- 1.5 The CCTV is monitored centrally from the main business office. Access to the images is controlled and accessed on an as needed basis. Access is password protected.
- 1.6 The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff.
- 1.7 The Step by Step CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV and the associated images are covered by the Data Protection Act 2018. This policy outlines Step by Step's use of CCTV and how it complies with the Act.
- 1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. Through this policy, all operators are made aware of their responsibilities in following the CCTV Code of Practice. The School Business Manager will ensure that all employees are aware of the restrictions in relation to access to, and disclosure of, recorded images by publication of this policy.



## Statement of Intent

- 2.1 Step by Step complies with the Information Commissioner's Office (ICO's) CCTV Code of Practice to ensure that CCTV 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/1542/cctv-code-of-practice.pdf>
- 2.2 CCTV warning signs are clearly and prominently placed at the main external entrance to Step by Step, including further signage in other outdoor areas in close proximity to camera positions. Signs will contain details of the purpose for using CCTV. In areas where CCTV is used, Step by Step will ensure that there are prominent signs placed within the controlled area.
- 2.3 The original planning, design and installation of CCTV equipment endeavoured to ensure that the scheme will deliver 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.

## Siting the Cameras

- 3.1 Cameras are sited so that they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. Step by Step will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.
- 3.2 Step by Step will make every effort to position cameras so that their coverage is restricted to Step by Step premises, which includes outdoor/indoor areas.
- 3.3 CCTV will not be used in personal areas (toilets for example) but in limited areas within the building that have been identified by staff and/or management as not being easily monitored at all times.
- 3.4 Members of staff will have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

## Covert Monitoring

- 4.1 It is not Step by Step policy to conduct 'covert monitoring' unless there are 'exceptional reasons' for doing so.
- 4.2 Step by Step may, in exceptional circumstances, determine a sound reason to set up covert monitoring. For example:
  - 4.2.1 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;



- 4.2.2 Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- 4.3 In these circumstances authorisation must be obtained from either the Board of Governors, Head Teacher or School Business Manager before any commencement of such covert monitoring.
- 4.4 Covert monitoring must cease following completion of an investigation.
- 4.5 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles, changing areas etc.

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

- 5.1 Recorded data will not be retained for longer than is necessary. 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.
- 5.2 All retained data will be stored securely at all times and permanently deleted as appropriate / required.

### **Access to CCTV images**

- 6.1 Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available.

### **Subject Access Requests (SAR)**

- 7.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act
- 7.2 All requests should be made in writing to the Head Teacher or Chair of Governors. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
- 7.3 Step by Step will respond to requests within 30 calendar days of receiving the written request as outlined in the Step by Step Data Protection policy.
- 7.4 Step by Step reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.



## Access to and Disclosure of Images to Third Parties

- 8.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to Step by Step where these would reasonably need access to the data (e.g. investigators).
- 8.2 Requests for images / data should be made in writing to the School Business Manager or Head Teacher, who is also the Data Protection Officer.
- 8.3 The data may be used within Step by Step's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

## CCTV Signage

It is a requirement of the Data Protection Act 2018 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. Step by Step is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for any enquiries

## Complaints

Complaints and enquiries about the operation of CCTV within the establishment should be directed to the Head Teacher, who is also the Data Protection Officer.

<b>Policy</b>	<b>CCTV</b>
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