



The Gryphon Trust

Use of CCTV Policy

GAT/0058

POLICIES AND PROCEDURES PROFORMA

Subject and Version of Document:	Use of CCTV Policy
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Persons/Committees etc consulted whilst document in draft:	IT Services Manager and Executive Team
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1	Jan 2022		Whole policy review

CCTV POLICY

1.0 Introduction

1.1 The Trust recognises that CCTV systems can be privacy intrusive therefore a review of this policy shall be repeated regularly, and whenever new equipment is introduced, a review will be conducted, and a risk assessment put in place. We aim to conduct reviews no later than every two years.

2.0 Objectives

- 2.1 The purpose of the CCTV systems are to assist the Trust in reaching these objectives:
- (a) To protect students, staff, and visitors against harm to their person and/or property.
 - (b) To increase a sense of personal safety and reduce the fear of crime.
 - (c) To protect the school buildings and other Trust assets.
 - (d) To support the police in preventing and detecting crime.
 - (e) To assist in identifying, apprehending, and prosecuting offenders.
 - (f) To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence
 - (g) To assist in managing the school.

3.0 Purpose of This Policy

3.1 The purpose of this Policy is to regulate the management, operation and use of the CCTV (closed circuit television) systems at the schools. The CCTV system used by the Trust comprises of 2x HikVision CCTV systems, with all cameras being fixed, without sound but have recording capacity. The following cameras are connected to the systems

Locations / Camera Reference

Main gate of the school – Camera located near fire alarm sounder above Safe Guarding office window of EC Building, views main gate and car park towards bike shed	Main Building First floor (main FF) – camera located opposite IPS office, views girls toilets and corridor (camera currently looking at the floor!!!)
Front of The Elizabeth Cook building – Camera located front corner of the EC building, views second car in from the path down towards Rec Centre	SCOLA 2nd floor top of stairs – camera located on maths floor outside M49, views girls toilets, top of stairs and M50
Car Park – Camera located corner of boiler house views side of reception, front of 6 th form and car park	SCOLA 2nd floor end of corridor (Scola Boys) – camera located on wall by M47, views towards boys toilets
Rear car park behind Art building (Rear Gate) – camera located back corner of new block, views gate, 2 parking spaces and path between fence and building	Behind the library (Astro Gym) – camera located on outside library wall looking towards the entrance of the Astro Turf
Quad – camera located humanities above door views quad from boiler house to field	Minibus parking area/playground (playground) – camera located on top of the Boiler House looking towards the Astro Turf, views the minibuses and a portion of the playground

The Catwalk – camera located outside of girls’ toilets and views area in front of the practical block and slight view of Snack Shack	Back of Humanities block (rear field) – camera located on corner of new building looking towards the Astro Turf, views path at the back of Languages/Textiles and field
Finance office (Safe) – camera located on back wall facing the safe, view safe, hatch and door	Bike shed – Camera located top right, views door and majority of bike shed
IT Support Office – camera located top right corner of office, views hatch and door and part of the office	Boiler house (Roof Boiler) – camera located on the roof of the boiler house looking towards the Cemetery, partial views of roof, playground and skip compound
Headteacher’s Office Window – camera located above Head Teachers window on EC building, views path and grass area in front of office and Learning Support	Facilities container (rear Portacabin) – camera located end of New Building looks at the Portacabin and towards the Rec Centre
Top of the driveway – camera located on the Arts Hub building viewing entrance to main building and towards Head Teachers office	Car park behind music – camera located corner of 6 th Form Block, looks towards new Facilities Office, views a small part of Arts Hub car park
Main school entrance – camera located directly above the door views only entrance through main double doors	Fire doors bottom of stairs by Textiles (backstairs) – camera located near T58 camera not working but should view Fire Doors
Reception – camera located above Fire Alarm panel looking towards the doors views entire office	Library – camera located above main door looking towards desk and through door
Path between SCOLA and Main Building (Path Main SC) – camera located above boys toilet external entrance, views path to Science and practical block	ICT corridor first floor (IT FF WC) – camera located on the ceiling just by L71 near the toilets, camera looking at toilets and corridor
Main Building ground floor (Main GF Boys) – camera located on wall near lift and views boys toilets and corridor	Canteen/server – camera located on end wall by main entrance shutter looks down main server and fridges towards exit

4.0 Statement of Intent

- 4.1 Notification has been submitted to the Information Commissioner and the next renewal date has been recorded.
- 4.2 The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.
- 4.3 The Trust and its schools will treat the system, all information, documents, and recordings (both those obtained and those subsequently used) as data protected under the Act. **Recorded data will be stored in an encrypted format.**
- 4.4 A Privacy Impact Assessment (PLA) has been undertaken. The systems have been designed so far as possible to deny observation on adjacent private homes, gardens, and other areas of private property.
- 4.5 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.
- 4.6 Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

- 4.7 The planning and design has endeavoured to ensure that the systems will give maximum effectiveness and efficiency but it is not possible to guarantee that the systems will cover or detect every single incident taking place in the areas of coverage.
- 4.8 Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible on the school sites and make clear who is responsible for the equipment.
- 4.9 Recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated. In the absence of compelling a need to retain images for longer (such as an ongoing investigation or legal action), **data will be retained for no longer than 30 days.**

5.0 System Management

- 5.1 Access to the CCTV system and data shall be password protected.
- 5.2 The CCTV systems will be administered and managed at the Arnewood School by Craig Price, Deputy Headteacher and at Eaglewood School by John Wood, who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager the system will be managed by Sarah Milligan, IT Manager.
- 5.3 The systems and the data collected will only be available to the Systems Manager, his/her replacement, CCTV reviewers (consisting of Head of Year staff, the pastoral team, Facilities) and appropriate members of the senior leadership team as determined by each Headteacher.
- 5.4 The CCTV systems are designed to be in operation 24 hours each day, every day of the year, though the Trust does not guarantee that it will be working during these hours.
- 5.5 The System Managers will check and confirm the efficiency of their school's system regularly and in particular that the equipment is properly recording and that cameras are functional.
- 5.6 Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by proving clear, usable images.
- 5.7 Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.
- 5.8 Where a person other than those mentioned in the paragraph above, requests access to the CCTV data or system, the System Manager must satisfy him/herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists access will be refused.
- 5.9 Details of all visits and external visitors will be recorded in a system log book including time/data of access and details of images viewed and the purpose for so doing. The log book is accessible on the internal Staff Drive for both schools.

6.0 Downloading Captured Data on to Other Media

- 6.1 In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any downloaded media used to record events from a hard drive must be prepared in accordance with the following procedures: -
- (a) Each downloaded media must be identified by a unique mark.
 - (b) Before use, each downloaded media must be cleaned of any previous recording.
 - (c) The System Manager will register the date and time of downloaded media insertion, including its reference.
 - (d) Downloaded media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a secure safe until collection. If a downloaded media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.
 - (e) If downloaded media is archived the reference must be noted.
- 6.2 Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his/her replacement and the Headteacher and other authorised senior leaders/CCTV reviewers. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable if possible, for that person to withhold viewing of the data until asked to do so by the police.
- 6.3 A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.
- 6.4 Should images be required as evidence; a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the downloaded media (and any images contained thereon) remains the property of the Trust, and downloaded media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The Trust also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media this will be produced from the secure evidence store, complete in its sealed bag.
- 6.5 The police may require the Trust to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until they are needed by the police.
- 6.6 Applications received from outside bodies (e.g. solicitors or parents) to view or release images will be referred to the Trust's Data Protection Officer and a decision made by a senior leader of the school in consultation with the school's data protection officer.
- 6.7 Recorded data will only be kept on the secure CCTV systems in place across the Trust. When data needs to be extracted for 3rd party use this will be processed as per a standard Subject Access Request and any data shared will be logged in the CCTV LogBook.

7.0 Complaints About the Use Of CCTV

7.1 Any complaints in relation to the school's CCTV system should be addressed to the Headteacher of the school site.

8.0 Request for Access by The Data Subject

8.1 The Data Protection Act provides Data Subjects – those whose image has been captured by the CCTV system and can be identified - with a right to access data held about themselves, including those obtained by CCTV. Requests for such data should be made to Judicium Consulting Limited, 72 Cannon Street, London, EC4N 6AE dataservices@judicium.com or 0203 326 9174.

9.0 Public Information

9.1 Copies of this policy will be available to the public from each school office.