



CCTV SYSTEM POLICY

1. Introduction

- 1.1 The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Hunters Hill Technology College (hereinafter referred to as “the School”).
- 1.2 The system comprises a number of fixed and dome cameras located around the school site. The Policy follows Data Protection Act guidelines.
- 1.3 Comments from interested parties are welcome and will be considered when the Policy is reviewed by Hunters Hill Governing Body.
- 1.4 The CCTV system is wholly owned by the School.

2. Objectives of the System

- 2.1 Safeguarding of pupils and staff.
- 2.2 To protect the school buildings and their assets.
- 2.3 To assist in managing the School.
- 2.4 To assist in relation to matters other than safeguarding, namely, the promotion of and compliance with Health and Safety standards and taking appropriate disciplinary measures, where so required.
- 2.5 The system will not be used to monitor staff conduct or performance, except where required to investigate the alleged commission of a crime.

3. Statement of intent

- 3.1 The School will treat the system and all information, documents and recordings obtained and used therefrom as data which may be deemed personal data requiring protection under the Data Protection Act.
- 3.2 Cameras will be used to monitor activities within the school circulation areas and its car parks and other public areas as an adequate, relevant and proportionate response to the achievement of the objectives identified at paragraph 2.
- 3.3 Cameras are not to focus on private homes, gardens and other areas of private property.



- 3.4 Materials or knowledge secured as a result of the use of the system will not be used for any commercial purpose. The recorded images shall be stored on the system hard drives which will only be released to media or other third parties with the written authority of the Head Teacher and/or Police if appropriate. DVD's containing personal data will never be released to the media or other third parties for any purpose that is not permitted under the Policy without the Data Subject's consent.
- 3.5 The planning and design of the system has endeavoured to ensure that it will give maximum effectiveness and efficiency insofar as is reasonably practicable 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, have been placed at all access routes to areas covered by the school CCTV's to inform all persons who may be deemed Data Subjects of the operation of the System.

4. Operation of the System

- 4.1 For the purposes of the Data Protection Act the Data Controller will be Hunters Hill Technology College. In practice, the System will be managed by the Head Teacher (hereinafter referred to as "the Administrator") in accordance with the principles and objectives expressed in the Policy.
- 4.2 The day-to-day management will be the responsibility of the Administrator or any other person expressly authorised by the Head Teacher who must be a member of the Leadership Team. Other senior personnel may also be authorised by the Head Teacher to view recorded images for the purposes outlined in this Policy.
- 4.3 The System will be operated 24 hours each day, every day of the year, except for periods of breakdown or necessary maintenance.

5. Control System(s)

- 5.1. The recording equipment is located in 3 locked cabinets: (1) Cropwood Office, (2) the Server Room within the Main School site and (3) the Quiet Reflection Room. The keys will be held in the School Safe and will only be released under the direct authorisation of the Administrator. Keys will be signed for on issue and return.
- 5.2 The Administrator or authorised senior personnel will check and confirm the efficiency of the System regularly and in particular that the equipment is properly recording and that cameras are functional. A regular check that the date and time stamp recorded on the images is accurate will be made.



- 5.3 Access to viewing will be limited to people strictly authorised by the Administrator. Recorded images will be viewed in a restricted area. All secondary monitors will be switched off at the time of viewing.
- 5.3 If out of hours emergency maintenance arises the BSS staff, under the direction of the Administrator, must be satisfied of the identity and purpose of contractors before allowing access to the Control cabinet/s.

6. Monitoring procedures

- 6.1 Camera surveillance will be maintained at all times.
- 6.2 Monitors are installed in the following areas and will be used only in accordance with this Policy:

Main School Site :

- (1) Reception
- (2) Administration/Finance Office
- (3) Head Teacher's Office
- (4) Server Room
- (5) Quiet Reflection Room (independent CCTV)

Cropwood CCTV:

- (1) Office

7. Video recording procedures

- 7.1 Recordings are made to the hard disk of each Control System and are stored for a period of 2 weeks before they are automatically overwritten. As the cameras are triggered by motion the storage period may, during school holidays for example, extend beyond the average 2 week period. The equipment is programmed to delete images after 28 days automatically. Data can be recorded on to DVD's for specific purposes in accordance with this Policy and with the authorisation of the Administrator. Such DVD's must be securely stored in the School Safe.
- 7.2 In order to maintain and preserve the integrity of the DVD's used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:
 - (i) Each DVD must be identified by a unique mark.
 - (ii) Before use each DVD must be cleaned of any previous recording.



- (iii) The Administrator shall register the date and time of DVD insert, including DVD reference.
- (iv) Any DVD required for evidential purposes must be sealed, witnessed, signed by the Administrator, dated and stored in a separate and secure, safety container. If a DVD 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, signed by the Administrator, dated and returned to the evidence DVD store.
- (v) If the DVD is archived the reference must be noted.

7.3 A record will be maintained of the release or viewing of DVD's to the Police or other authorised person(s). A register will be maintained for this purpose. The register will be located with the Administrator.

7.4 Should a DVD be required as evidence, a copy may be released to the Police under the procedures described in paragraph 7.2 (iv) of this Policy. DVD's will only be released to the Police on the clear understanding that the recording remains the property of the School, and both the DVD 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 DVD or any part of the information contained thereon. On occasions when a Court requires the release of an original DVD this will be produced from the secure evidence DVD store, complete in its sealed bag.

7.6 The Police may require the school to retain the stored DVD's for possible use as evidence in the future. Such DVD's will be properly indexed and properly and securely stored until they are needed by the Police.

7.7 Applications received from outside bodies (e.g. solicitors) to view or release personal data stored on DVD's and held by the School will be referred to the Administrator. In these circumstances a copy of the relevant DVD will normally be made available for viewing or released 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. A maximum fee of £10 can be charged in such circumstances.

8. Breaches of the Policy (including breaches of security)

8.1 Any breach of the Policy by School staff or any other person with delegated responsibility under the Policy will be initially investigated by the Administrator, in order for the appropriate disciplinary action to be initiated.



- 8.2 Any serious breach of the Policy will be immediately investigated and an independent investigation will be carried out by nominees of the Administrator to make recommendations on how to remedy the breach.
- 8.3 In the event of any breach by the Administrator then an independent investigation will be carried out by the School Governing Body.

9. Assessment of the System

- 9.1 Performance monitoring, including random operating checks, will routinely be carried out by the Administrator.
- 9.2 An independent check on the operation of the system will be undertaken on an annual basis and a Certificate confirming the system is operating correctly will be issued and retained.

10. Complaints

- 10.1 Any complaints about the School's CCTV System should be addressed to the Head Teacher or Chair of Governors.
- 10.2 Complaints will be investigated in accordance with paragraph 8 of the Policy.

11. Access by the Data Subject

- 11.1 The Data Protection Act provide Data Subjects (individuals to whom "personal data" relate) with a right of access to personal data held about themselves (including images recorded by the System and stored on DVD's), under the terms of the Act.
- 11.2 Requests by Data Subjects for such access should be made in writing to the Head Teacher.
- 11.3 The form of access granted may consist of facilities being offered at the School premises to view the relevant personal data or the release of a copy DVD storing the relevant personal data.

12. Public information

Copies of this Policy will be available on written request from the School Office.