



Policies

CCTV Policy

Next review date – April 2026



INTRODUCTION (1)

- The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Holmes Chapel Comprehensive School, hereafter referred to as 'the school'.
- The system comprises 120 fixed dome cameras located around the school site. All cameras are monitored within the school or Leisure Centre and are only available to selected authorised users.
- This Policy follows Data Protection Act guidelines as set out by the Information Commissioner.
- The Policy will be subject to review periodically, but at least biennially, to include consultation as appropriate with interested parties.
- The CCTV system is owned by the school.

OBJECTIVES OF THE CCTV SCHEME (2)

- To protect the school and leisure centre buildings and their assets
- To assist in safeguarding our students, staff and visitors
- To increase personal safety and reduce the fear of crime
- To deter anti-social acts against persons and property
- To support the Police in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property
- To assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings
- To assist in the defence of any litigation proceedings
- To assist in managing the school

STATEMENT OF INTENT (3)

- The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act and will seek to comply with the requirements of the Data Protection Act, 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 is protected by the Act.
- Cameras will be used to monitor activities within the school, leisure centre and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well being of the school, together with its visitors. The cameras will also be used to help with behaviour incidents.
- Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.
- Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained as set out in the Regulation of Investigatory Powers Act 2000.
- Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the Police. Recordings will never be released to the media for purposes of entertainment.

LOCATION OF CAMERAS (4)

- Cameras are and will be sited so they only capture images relevant to the purposes for which they are installed as described above. Care will be taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered and all captured data is processed in a responsible, secure manner.
- The school may place cameras in toilet areas in order to safeguard our students in these areas as well as to reduce vandalism.
- The placement of cameras in toilet areas is taken extremely seriously so as to ensure that users of the facilities have a reasonable right to privacy. To this end cameras will only be positioned to cover sink and communal areas within the toilets and will never show areas such as urinals or inside cubicles. A privacy mask is also applied on cameras where necessary to ensure that these areas are not viewable. Mirrored images within the environment are also considered in the placement of devices.
- The planning and design 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.
- 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.

COVERT SURVEILLANCE (5)

The school may in exceptional circumstances set up covert monitoring. For example:

- 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;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from the Head teacher or a member of the Senior Management Team and the proper authorisation forms from the Home Office will be completed and retained. Covert monitoring must cease following completion of an investigation.

OPERATION OF THE SYSTEM (6)

- The Scheme will be administered and managed by Tony Halsall, Director of Operations in accordance with the principles and objectives expressed in the code.
- The day-to-day management will be the responsibility of the Strategic ICT Manager.
- Authorised personnel with live access only have access to cameras as agreed by the Head teacher dependent on their job role. i.e. 6th Form staff have access to the 6th Form area cameras.
- Leisure centre staff will have access to live and recorded footage only of cameras that cover the shared use areas of the site.
- The system as a whole is supported by Topological Solutions, who install new equipment, network points and support the NVRs. Topological have access to the Admin account for the entire system. Topological can only access the system when on site under strict supervision as no remote support is available.
- NVRs and all stored data associated with are classed as 'non mission critical'. To this extent no backups are made of the system as a whole.
- The CCTV system will be operated 24 hours each day, every day of the year.

SYSTEM FUNCTIONALITY AND ACCESS (7)

- Each IP Camera connects to a Network Video Recorder (NVR) which is stored in a restricted area accessible only by key lock. Unauthorised access to this area is not permitted at any time. NVRs located in this room can be attached to a monitor for administration purposes.
- Outside of the restricted area access to the system to view Live and Recorded images from public areas is via IP through a browser and access is controlled via secured logins given to authorised personnel only.
- The Strategic ICT Manager will check and confirm the efficiency of the system on a weekly basis and in particular that the equipment is properly recording and that cameras are functional.
- Access to the CCTV control facilities will be strictly limited to the staff employed by Holmes Chapel Comprehensive School and the Leisure Centre.
- Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.
- Control operators must satisfy themselves over the identity of any other visitors to the CCTV Control Room and the purpose of the visit. Where any doubt exists access will be refused.
- The system may generate a certain amount of interest. It is vital that operations are managed with the minimum of disruption.
- If out of hours emergency maintenance arises, the Site Team must be satisfied of the identity and purpose of contractors before allowing entry.
- Full details of visitors including time/date of entry and exit will be recorded.
- When not manned the facility must be kept secured.
- Other administrative functions will include the maintenance of recordings eg: video tapes and hard disc space, filing, and system maintenance logs.
- Emergency procedures will be used in appropriate cases to call the Emergency Services.

MONITORING PROCEDURES (8)

- Camera surveillance may be maintained at all times by authorised personnel.
- A network video recorder is installed in a restricted room to which pictures will be continuously recorded.

RECORDING PROCEDURES (9)

- When footage of an incident is requested the recordings are stored outside of the system using the Schools Google G Suite in the ICT Technician's Team Drive in a folder labelled 'CCTV'. This folder is accessible by the Strategic ICT Manager, IT Technician, Head teacher, SLT, and Upper/Lower school Teams. This footage will be retained for 12 months.
- Recorded data may also be shared with other members of staff if appropriate and in line with this policy, such as for identification purposes.
- RAW recorded footage stored on the NVR is retained for an undefined time period when the system overwrites itself dependent on its available storage.
- A recording stored on removable media required for evidential purposes must be encrypted, sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence record store. If a record 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 controller, dated and returned to the evidence record store.
- If the record is archived the reference must be noted.
- Records may be viewed by the Police for the prevention and detection of crime.
- A record will be maintained of the release of recordings to the Police or other authorised applicants. A register will be available for this purpose.
- Viewing of records by the Police must be noted in writing and in the log book.

- Records will only be released to the Police on the clear understanding that the record remains the property of the school, and both the record 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 record or any part of the information contained thereon. On occasions when a Court requires the release of an original tape this will be produced from the secure evidence record store, complete in its sealed bag.
- The Police may require the school to retain the stored records for possible use as evidence in the future. Such records will be properly indexed and properly and securely stored until they are needed by the Police.
- Applications received from outside bodies (e.g. solicitors) to view or release tapes will be referred to Nigel Bielby, Headteacher. In these circumstances records will normally be 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.

BREACHES OF THE CODE (including breaches of security) (10)

- Any breach of the Code of Practice by school staff will be initially investigated by Nigel Bielby, Headteacher or Tony Halsall, Director of Operations in order for them to take the appropriate disciplinary action.
- Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

ASSESSMENT OF THE SCHEME AND CODE OF PRACTICE (11)

- Performance monitoring, including random operating checks, may be carried out by the Senior Management Team.

COMPLAINTS (12)

- Any complaints about the school's CCTV system should be addressed to Nigel Bielby, Headteacher.
- Complaints will be investigated in accordance with Section 10 of this Code.

SUBJECT ACCESS REQUESTS (13)

- According to UK GDPR and DPA 2018, individuals have the right to request a copy of any CCTV footage of themselves.
- Upon receiving the request the school will immediately issue a receipt and will then respond within 30 days during term time. The school reserves the right to extend that deadline during holidays due to difficulties accessing appropriate staff members.
- All staff have received training to recognise SARs. When a SAR is received, staff should inform the DPA and the request should be logged on GDPR Sentry. When making a request, individuals should provide the school with reasonable information such as the date, time and location the footage was taken to aid school staff in locating the footage.
- On occasion the school will reserve the right to refuse a SAR, if, for example, the release of the footage to the subject would prejudice an ongoing investigation.
- Images that may identify other individuals need to be obscured to prevent unwarranted identification. The school will attempt to conceal their identities by blurring out their faces, or

redacting parts of the footage. If this is not possible the school will seek their consent before releasing the footage. If consent is not forthcoming the still images may be released instead.

- The school reserves the right to charge a reasonable fee to cover the administrative costs of complying with an SAR that is repetitive, unfounded or excessive.
- Footage that is disclosed in a SAR will be disclosed securely to ensure only the intended recipient has access to it. This will be done through Google drive and shared with the recipient's email address.
- Records will be kept that show the date of the disclosure, details of who was provided with the information (the name of the person and the organisation they represent), and why they required it.
- Individuals wishing to make an SAR can find more information about their rights, the process of making a request, and what to do if they are dissatisfied with the response to the request on the [ICO website](#).
- Requests for Data Subject Access should be made to Tony Halsall, Director of Operations.

PUBLIC INFORMATION (14)

Copies of this Policy document will be available to the public from the School Office and the website.

Summary of Key Points

- This Policy document will be reviewed every two years.
- The CCTV system is owned and operated by the school.
- The Control system is not open to visitors except by prior arrangement and good reason.
- Any recordings will be used properly, indexed, stored and destroyed after appropriate use.
- Recordings may only be viewed by authorised school members, Leisure Centre staff and the Police
- Recordings required as evidence will be properly recorded, witnessed and packaged before copies are released to the Police.
- Recordings will not be made available to the media for commercial or entertainment purposes.
- Recordings will be disposed of securely.
- Any breaches of this Policy will be investigated by Tony Halsall, Director of Operations.
- An independent investigation will be carried out for serious breaches.
- Breaches of the Policy and remedies will be reported to Nigel Bielby, Headteacher

Date: 11/01/23