



*Tomlinscote School
Sixth Form College*

A Specialist Language College

Surrey Heath Education Trust

CCTV Policy and Guidance

Policy Type:	Mandatory
Approved By:	Resources Committee
Effective From:	May 2017
Revision Date:	May 2020

Tomlinscote School

CCTV Policy and Guidance

Register with the Information Commissioner's Office: Registration Number Z5207632

Principles and Aims

To aid and improve security of buildings and facilities, and for the security and protection of staff, students and visitors. The CCTV system is based around digital technology and therefore, will be treated as information that will be processed under the general principles of the Data Protection Act 1998. It follows the "In the picture: A data protection code of practice for surveillance cameras and personal information" by Information Commissioner's Office 2013 (Updated May 2015) (available via the Information Commissioner's Office).

Objectives of the CCTV scheme

- (a) To protect the School site, buildings and assets
- (b) To increase personal safety and reduce the fear of crime
- (c) To support the Police in a bid to deter and detect crime
- (d) To assist in identifying, apprehending and prosecuting offenders
- (e) To protect members of the public and private property
- (f) To assist in managing the School

Tomlinscote School is committed to ensure that the data will be:

- Fairly and lawfully processed;
- Processed for limited purposes and not in any manner incompatible with those purposes;
- Adequate, relevant and not excessive;
- Accurate;
- Not kept for longer than is necessary;
- Processed in accordance with individuals' rights;
- Secure;
- Not transferred beyond the school, including countries without adequate protection.

The person ultimately responsible for Data Protection within Tomlinscote School is the Interim Principal. The Interim Principal has designated the Senior Leadership Team as having delegated responsibility and therefore they may access CCTV system. To support the SLT in undertaking their duties the ICT Manager and Premises Manager and, in their absence or at their request, members of their teams, have also been given delegated responsibility to access the system. Other individual staff may be requested to view recordings for identification purposes by the SLT.

The purpose of the scheme is to ensure that CCTV coverage of key areas of the site of Tomlinscote School can be recorded and monitored to provide security from intrusion, damage or disruption and those within the site of Tomlinscote School from intentional or accidental hurt, or for such incidents to be monitored, either in real-time or for subsequent investigation.

The position of cameras will be determined by the Premises Manager in consultation with the Head of School responding to the changing needs of the staff, students and security threats. Requests from students to place additional cameras should be made through the School Council.

All relevant stakeholders will be informed of the use and purpose of the scheme on the site of Tomlinscote School, by the signage, which can be found at both entrances to the school and around the site.

The quality of images produced by the equipment will be such that positive matches against any existing member of staff, student, authorised visitor or unauthorised intruder may be made by nominated personnel or legal authorities. This may only be done in accordance with the purpose of the scheme, e.g. legal authorities identifying intruders, Heads of Year identifying perpetrators of vandalism.

Images will be kept no longer than is necessary. For Tomlinscote School this will be 14 days, unless a request has been made for images to be processed or accessed by relevant members of staff or by a legal authority. Such data will be retained only for the period required for any investigation or legal proceedings to take place and be concluded. Images required for evidential purposes will be retained in a secure location. Once the retention period has expired the images will be removed or erased. Should media, on which images have been recorded, be removed for use in legal proceedings the nominated operator will ensure that the following is documented. (See Appendix A).

- 1) The date on which the images were removed from the general system for use in legal proceedings.
- 2) The reason why they were removed from the system.
- 3) Any crime incident number to which images may be relevant.
- 4) The location of the images.

For example – if the images were handed to a police officer for retention, the name and station of that police officer.

- 5) The signature of the collecting police officer, where appropriate.
- 6) The reason for the viewing.
- 7) The names, where appropriate, of those who viewed the images.
- 8) The outcome of any viewing.
- 9) The date and time the images were returned to the system or secure location (if they still require retention).
- 10) Details of any copies made of recorded images.

All operators will receive instruction in the Data Protection Principles involved when viewing images, whether monitoring in real-time or recorded images. This includes ensuring that no others shall view images other than for the purposes of the scheme, access to images by those outside of the control of the scheme shall be limited to legitimate reasons associated with the purpose of the scheme. For example – Law enforcement agencies where images recorded would assist in a specific criminal enquiry associated with the School, prosecution agencies, relevant legal authorities, the media, where it is decided that the public's assistance is needed in order to assist with the identification of victim, witness or perpetrator in relation to a criminal incident. As part of that decision, the wishes of the victim of an incident should be taken into account. The decision to allow access to those outside of the scheme shall be taken by two members of senior staff, one of which must be either the Head of School or nominated person.

The School will not make images more widely available by any media other than those specified above. Third parties with access to images are required to sign a statement to say that they agree to abide by the School's published policy and procedures for the use of CCTV images, including forming a contractual obligation if required. All parties will follow the Data Protection Principles at all times.

Access by data subjects is a right provided under section 7 of the Data Protection Act 1998. The School recognises this right and will follow a standard set of procedures should a request be made upon a completed request form being submitted to the Head of School or nominated person. Any fee charged will be made clear on the request form. Requests will be processed within a specified time period (ie 21 days of receiving the required fee and information).

The person making the request must be clearly identified and made known to the operator. This may require the presentation of legal documentation with photographs, eg passport or driving licence. Other

members of staff may be requested to vouch for the person making the request and this shall be recorded. Individuals will be provided with a form on which to describe the images which are believed to be recorded, the purposes for which they are required. The form, attached as Appendix B, for the request of information/images should be, where possible, completed by the person making the request.

The Head of School or nominated person will consult with relevant members of staff to determine whether it is appropriate for images of other parties to be disclosed to an individual, and whether any images which include third parties are held in confidence. If third party images are not to be disclosed then the Head of School or nominated person is to arrange for third party images to be disguised or blurred. If this is completed by a company or third party then a contractual relationship may be required in addition to signing agreement to follow the School's policy on use of images.

All requests should be dealt with under the following procedure.

- 1) Request can be made up to 4 days following the incident or images required, using the Request Form in Appendix B. This is a limiting factor as the current recording equipment has a small storage facility.
- 2) Each case will be treated individually.
- 3) Requests will be reviewed by the Head of School or a nominated person, once the CCTV images have been located. This is in no way intended to limit the rights of the person requesting the information.
- 4) The Head of School or nominated person will make a decision regarding the release of the images to the individual making the request against the following criteria:
 - The individual requesting the images is the parent/carer of the student in the CCTV footage
 - The intended purpose for the request
 - The impact on other students in the CCTV footage. If other people are identifiable in the CCTV pictures, then the images would be considered personal information and therefore, exempt from the Freedom of Information Act.
 - The availability of the technology required to blur out other individuals in the CCTV images
- 5) If the Head of School, or nominated person, decide that the request will not be complied with, they must set out their reasons in the response to the individual, within 21 days of the request.
- 6) A copy of the request and the response will be retained for the period specified for all data requests under the Data Protection Policy.
- 7) If, within 21 days of that notification, the individual requires, in writing, the decision to be reconsidered, the Head of School or nominated person shall reconsider the decision.
- 8) On receipt of a request to reconsider a decision, the Head of School or nominated person shall respond within 21 days setting out the steps that they intend to take to comply with the individual's request.
- 9) All correspondence dealing with requests, decisions, appeals and subsequent responses shall be documented and retained for a period of 10 years.

All staff who may come into contact with images, individuals requesting access to images or third parties requesting information about images will be made aware of this policy, the contents and procedures involved. Complaints about any part of this policy or procedures contained within will be dealt with by the School's Complaint Procedure (Located on the school website). This policy and containing procedures are subject to ratification by the AQC (Academy Quality Council) and will be reviewed annually.

APPENDIX A

CCTV – DISCLOSURE OF DATA TO POLICE

Section A

Reason Data required: (To be completed by Police Officer)

I can confirm that the above data is required by me for any of the following reasons contained within sections 28(1), 29(1)(a) and (b) and 35(2)(a) of the Act.

- | | |
|--------------------------|--|
| <input type="checkbox"/> | For the purpose of safeguarding national security |
| <input type="checkbox"/> | The prevention or detection of crime |
| <input type="checkbox"/> | For the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings) |
| <input type="checkbox"/> | Is otherwise necessary for the purposes of establishing, exercising or defending legal rights |

(tick as required)

Name: _____

Number: _____

Police Force: _____

Station: _____

Signature: _____ Date: _____

Crime/Incident number: _____

Section B

Description of Data to be disclosed (For Completion by School representative)

Disclosure of Data contained within computerised records.

View: / Take possession of: Disk copy / Printout / Given verbally:

School representative making disclosure

Name: _____

Signature: _____ Date: _____

Department: _____

APPENDIX B – Subject Access Request Form

Please complete the following form below providing as much detail as possible to allow Tomlinscote School to identify and locate the information requested.

Completed forms should be returned in a sealed envelope to Tomlinscote School marked “Information Request” and for the attention of the Head of School.

Details of Applicant:

Title: _____

Forename: _____

Surname: _____

Address: _____

Postcode: _____

Daytime phone number: _____

Evening phone number: _____

Mobile phone number: _____

Email address: _____

If this application is being made on behalf of an organisation please provide details below:

Name of Organisation:

Details of Request:

To allow your request to be dealt with quickly and efficiently, please give as much detail as you can. You should try to give, where known, site location, date and time. If you are not sure about something it may be better to ask first and we will try to help you. However, if your request cannot be clarified even with our help, we may not be able to find the information that you really want.

Fees and Charges

The School will charge a fee of up to £10 for providing you with the information you have requested. This is based on the number of photocopies made, administrative time and sundry costs. If it is necessary to make a charge we will notify you of the amount payable following receipt of your application.

Data Protection

The personal information that you provide will be used to process and administer your request for information. It may be shared with educational agencies, the Borough and County Councils and externally with other agencies for this purpose. Personal information will be held in accordance with the requirements of the Data Protection Act 1998.

Note: If other people are identifiable in the CCTV pictures then the images will be considered to be personal information and therefore are exempt under the Freedom of Information Act.

Request Approved/Denied: Signature: _____

Head of School

Date: _____