

Siddal Moor  
Newhouse Road  
Heywood  
Lancashire  
OL10 2NT  
Tel: 01706 369436  
Email: [office@siddalmoor.uk](mailto:office@siddalmoor.uk)  
web: [www.siddalmoor.uk](http://www.siddalmoor.uk)

# CCTV Policy

Revised 2.1 January 2018

Ratified by Governors at a meeting of the Curriculum and Standards Committee on May 2<sup>nd</sup> 2018

Ratified in its present form pending review / updates in the Autumn Term to ensure compliance with GDPR



**SIDDAL  
MOOR**

Where students *fly high* through the expectation of *excellence* in *everything* we do

## **1. Introduction**

Siddal Moor has a comprehensive suite of CCTV cameras fitted inside and outside the building. The system was designed and installed when the building was constructed in 2011 and its intended purpose is to:

- Improve security of buildings, facilities and equipment and help to ensure that they are kept secure from intrusion, damage or disruption.
- Help to ensure the safety and security of all members of the school community: staff, students, visitors and community users.
- To allow a record to be kept of any incidents which may require subsequent investigation.

The school also has two portable Lessonbox CCTV systems designed for temporary use in classrooms. These are intended for use in developing teaching, by providing evidence for the professional development of staff and reflective practice. They are not to be used for any form of continuous monitoring or surveillance or to be permanently left in one location.

The school CCTV systems are based around digital technology and therefore need to be treated as information that will be processed under the general principles of the Data Protection Act 1998. The school will follow the CCTV Code of Conduct (2008 Revision) produced by the Information Commissioner's Office and this policy has been written to reflect the best practice outlined in this Code of Conduct.

## **2. Scope and Extent of Installed System – Fixed CCTV cameras**

The system comprises of 78 digital IP dome cameras which record video and sound, of which 25 are external. A plan showing the location of the camera is maintained in the school IT office. The cameras are fixed position and not routinely re-located. They do not have PTZ functionality and the fields of view are therefore set on installation.

Camera locations are designed to monitor key areas of circulation spaces within and around the outside of the building and to provide a view of all major entrances/exits to the building. There are also cameras positioned to monitor the main car park. Cameras have been placed to ensure that the field of view does not extend beyond the school premises and privacy masks are implemented on certain cameras to ensure this.

The school makes no guarantee that the coverage is comprehensive and will capture all incidents that occur in any part of the building. It is the policy of the school not to place cameras in teaching spaces, offices, toilets or changing rooms. As well as having regard to privacy issues placement of cameras in any of these areas is not necessary to meet the stated purpose of the system.

The cameras are integrated into the building IT system and operate on their own subnet with logical traffic separation – camera data is passed on a separate dedicated VLAN. The servers which hold the recorded images are situated in a secure server room to which only IT support staff have access and is subject to the standard school network security policies as outlined in

the schools Computer Access and Security Policy. The system uses digital image recording and requires specialist software to view the live and recorded images.

Images are held for a period of 28 days on the central server (unless a request has been made for images to be processed or assessed by relevant members of staff or by a legal authority and a copy of these images made onto separate medium) and are then deleted automatically by the system software. This is considered to be an acceptable time for any relevant incidents to come to light.

The CCTV system is owned and operated by the school, and its scope, deployment and use is determined by the school's senior leadership team.

The Lessonbox portable systems are stored in a secure storeroom accessible only by the IT Support Staff. The recordings made by the system are stored on encrypted laptops secured by a password which are built into the security cases in which the system is supplied. The system uses digital image recording and specialist software is required to view the live and recorded images.

### **3. Scope and Extent of Installed System – Lesson Box System**

The Lesson Box system is designed to be used for targeted professional development purposes. It is not intended to be used to film large numbers of lessons in case some of the footage might be useful, but only when a clearly defined need is identified. These include:

- Filming a lesson to provide examples of good practice or illustrate a particular teaching technique or strategy.
- Filming a new activity or demonstration to provide an exemplar of how it should be done.
- Filming a lesson to support NQT's in their professional development.
- Filming a lesson involving a difficult class in order to inform the development of appropriate teaching strategies.
- In support of the staff appraisal process.

Use of the Lesson Box system is entirely under the control of the classroom teacher concerned. It will only be used at the direct request of a classroom teacher who is leading a lesson. Lessons will not be recorded without the full informed consent of the class teacher leading the lesson. The recording can be started and stopped at any point by the class teacher who retains full control over the relevant hardware at all times when it is in use in their classroom. A log will be kept with the lesson box equipment which records:

- The date and lesson in which the system was used
- The purpose of the use
- The timetable reference of the class involved
- Signature of the class teacher indicating their request for and consent to its use.

When the system is in use in a classroom a sign will be posted at the entrance to the room indicating to anyone who enters the room during the recording that a camera system is in used. A suitable sign is included in the Lesson Box equipment.

When the system is in use the class teacher should inform all persons present in the room at the start of the lesson that the lesson is being recorded. Other staff who are usually present in the room such as Teaching Assistants, Technicians who do not wish to be filmed should be given the opportunity to either leave the room before the recording is started or work in a part of the room which is not recorded by the cameras.

#### **4. Responsible Persons**

The person ultimately responsible for Data Protection and the Senior Information Risk Officer within the school is the Headteacher.

Day to day implementation of Data Protection requirements is devolved to the school IT Manager who acts as the Data Controlling Officer for the purposes of this policy.

The Data Controlling Officer will:

- Ensure that system is operated in accordance with this policy.
- Maintain all documentation relating to the system, and to any requests for access to images.
- Ensure that staff with access to images are aware of the procedures that need to be followed when accessing the images.
- Ensure that adequate signage is in place in and around the building which meets the recommendations of the code of practice.
- Ensure that staff are aware of the restrictions in relation to access to and disclosure of images.

The management maintenance and operation of the CCTV system is the day to day responsibility of the school IT Support staff who will carry out regular checks to ensure that the system is operating correctly and undertake any maintenance as required in a timely manner to ensure the system continues to meet its purpose.

#### **5. Access to CCTV Images from the campus CCTV system**

The ICT Support staff will access live images from cameras from time to time in order to monitor the correct operation of the system and carry out any maintenance or adjustment required, but they will not routinely monitor live images. It may be necessary from time to time for staff of contractors working on the system to access images for testing purposes: this must always be carried out under the supervision of the school ICT support staff.

The Behaviour Managers also have access to live images as part of their job role within the school.

## **6. Access to Recorded Images from the campus CCTV system**

Access to recorded images is restricted to the following staff:

- ICT Support staff who may need to view images to check correct operation of the system, or may be asked to retrieve images by another authorised member of staff.
- Members of the school Senior Leadership Team (SLT).

Members of SLT may additionally allow other staff to view images for the purposes of identifying individuals shown on the recordings or assisting in the location and identification of an incident which requires review.

Access to recordings will normally be carried out in the IT Office with the assistance of a member of the ICT support staff. A log will be kept in the IT office of all such requests and will include who requested the footage, which member of the SLT authorised the request, the purpose for which it was required, and who viewed the footage.

If a copy of a recorded image is required, for further investigative purposes, such a copy may only be requested by a member of SLT and the copy will be made by one of the IT Support Staff and the copy media given to the member of SLT concerned, who should sign for it in the log.

Copies of images taken in this way should be returned to the IT support staff for secure destruction when they are no longer required for investigation or resolution of an incident and the fact that this has been done should also be recorded in the log.

Subject to the requirements of Subject Access Requests (see below) the school will not allow recorded images to be viewed or retained by persons who do not work at the school or by representatives of other organisations, except in the following circumstances:

1. If a request has been made for images to be processed or assessed by relevant members of staff of a legal authority such as the police. If copies of recorded images are required to be taken off site by such an authority for this purpose, or to be used as evidence, this will require approval of the Headteacher and the fact that this has been done should be logged by the Data Controller.
2. The Headteacher may determine that it is appropriate for images of other parties to be disclosed to an individual, in order for example to investigate or resolve an incident in which they may have been involved or witnessed. If such a viewing is carried out, it must be supervised by a member of SLT who should log the viewing and any outcome of it in writing.

## **7. Access to recorded images from the Lesson Box system.**

The ICT Support staff will copy recorded footage from the Lesson Box system and provide one copy to the classroom teacher who requested the recording. This will be placed in their private area of the school network.

Only the class teacher concerned can view the recordings unless he/she has given verbal or written permission for others to view them. They must view the recording by running the

recorded footage from their private user area. The recordings may be deleted by the class teacher at any time.

Under no circumstances should the recordings be copied from the school network or taken off site.

Under no circumstances should any part of the recordings, including still images, be used for any purpose other than those outlined in section 3 above, nor should they be posted to any external website or social media outlet, nor should they be shown to anyone who is not employed at the school.

Subject to the requirements of Subject Access Requests (see below) the school will not allow the recorded images to be viewed or retained by persons who do not work at the school or by representatives of other organisations, except in the following circumstances:

1. If a request has been made for images to be processed or assessed by relevant members of staff of a legal authority such as the police. If copies of recorded images are required to be taken off site by such an authority for this purpose, or to be used as evidence, this will require approval of the Headteacher and the fact that this has been done should be logged.
2. The Headteacher may determine that it is appropriate for images of other parties to be disclosed to an individual, in order for example to investigate or resolve an incident in which they may have been involved or witnessed. If such a viewing is carried out, it must be supervised by a member of SLT who should log the viewing and any outcome of it in writing.

## **8. Subject Access Requests**

Access by data subjects is a right provided under section 7 of the Data Protection Act 1998. The School recognises this right. Requests for access to images relating to an individual should be made in writing to the Headteacher and should contain sufficient information to allow the relevant footage relating to them to be identified, for example date, time and location. Further details about applying for a Data Access request can be found in school Data Protection Policy.

Note that the school reserves the right to charge a fee for such requests to cover administrative costs.

The school will respond to any such requests received within 40 calendar days of receiving the written request and fee.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

## **9. Complaints**

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.

## **10. Policy Review**

This policy will be reviewed by the Data Controller in the light of any changes to relevant legislation, significant physical or operational changes to the CCTV system or significant operational or management changes within the school.

### *Review History*

*2.1 Reviewed in Jan 2018 by the IT Manager to reflect increase in number of cameras.*

*2.0 Reviewed in Nov 2016 by the IT Manager as a result of the acquisition and bringing into use of the Lessonbox system.*

*1.2 Reviewed in Feb 2016 by the IT Manager as a result of an increase in the number of cameras to 75.*

*1.0 Feb 2012 First Version*

