

Biddenham International School & Sports College

CCTV SYSTEM POLICY

1. INTRODUCTION

- 1.1. The purpose of this Policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at Biddenham International School, hereafter referred to as 'the school'.
- 1.2. The system comprises of 44 fixed and 2 PTZ cameras located in and around the school site. All cameras are monitored from Site office, ITS Office & Server Room and access is limited to Authorised System Managers/Site Agents or Delegated staff.
- 1.3. This Policy follows GDPR and Data Protection Act guidelines.
- 1.4. The CCTV system is owned by the school.
- 1.5. The School Policy will be subject to review bi-annually to include consultation as appropriate with interested parties.

2. OBJECTIVES OF THE CCTV SYSTEM

- 2.1. To protect pupils, staff and visitors.
- 2.2. To increase personal safety and reduce the fear of crime.
- 2.3. To protect the school buildings and assets.
- 2.4. Without prejudice, to protect the personal property of pupils, staff and visitors.
- 2.5. To support the police in preventing and detecting crime.
- 2.6. To assist in identifying, apprehending and prosecuting offenders.
- 2.7. To assist in managing the school.
- 2.8. To assist in supporting behavioural incidents

3. STATEMENT OF INTENT

- 3.1. The CCTV Scheme will be registered with the Information Commissioner under the terms of the General Data Protection Regulation (GDPR) and Data Protection Act 2018 and will seek to comply with the requirements of both the GDPR and Data Protection Act and the Commissioner's Code of Practice.
- 3.2. The school will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.
- 3.3. Cameras will be used to monitor activities within the school, car parks & Grounds to identify criminal activity actually occurring, anticipated, or perceived. It will be used for the purpose of securing the safety and wellbeing of the pupils, staff and school together with its visitors. All the cameras are positioned to ensure

maximum coverage of the school site, both internal and external, thereby ensuring the school is a safe and secure environment.

- 3.3.1. The system has been designed to deny observation on adjacent private homes, gardens and other areas of private property. Staff have been instructed that PTZ cameras are not to focus on private homes, gardens and other areas of private property.
- 3.3.2. 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 for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.
- 3.3.3. The system shall not be used to live track or monitor individuals unless the individual is a known intruder or known risk to the school buildings and assets or pupils, staff and visitors or there is a pending threat of loss or harm.
- 3.3.4. Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Exported media will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Exported media will never be released to the media for purposes of entertainment.
- 3.4. The planning and design has endeavoured to ensure that the system 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.
- 3.5. 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.

4. SYSTEM MANAGEMENT

- 4.1. The system will be administered and managed by the Biddenham International School and Sports College who will act as the Data Controller, in accordance with the principles and objectives expressed in the policy.
- 4.2. The day-to-day management will be the responsibility of the System Managers during the day and the Delegated Site team out of hours and at weekends.
- 4.3. The CCTV should only be accessed when an incident has been reported via the [CCTV Request form](#). Verbal requests must also be completed via the form to log the incident and how the request was reconciled (System managers are exempt, for maint, config, optimisation etc).
- 4.4. The system and the data collected will only be available to the Data Controller, the Head Teacher, System Managers & Delegated staff.
- 4.5. The CCTV system will be operated 24 hours each day, every day of the year.
- 4.6. The System Managers will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.

- 4.7. 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.
- 4.8. The System Manager or Delegates must satisfy themselves of the identity of any person wishing to view images or access the system and the legitimacy of the request. Where any doubt exists access will be refused.
- 4.9. Details of **ALL** visits and visitors viewing CCTV Footage will be recorded in the CCTV log book including time/data of access and details of images viewed.
- 4.10. Any visit may be immediately curtailed if prevailing operational requirements make this necessary.
- 4.11. Remote access to the CCTV system is limited to a limited number of workstations, and physical access to the CCTV system is restricted. Physical access is limited to the IT Support department and the Site team. Where access is required to physical room where the system is held the system will not be displaying any material on screen

Authorised System Managers/Delegated staff are;

System Managers

David Bailey - Principal

Daniel Emery - ICT Network Manager

Domanic Blaber - IT Technician

Site Agents/Delegated Staff

Andy Rick - Site Manager

Sharon Bayley - Site Agent

Ben Rick - Grounds Person & Assistant Site Agent

5. LIAISON

- 5.1. Liaison meetings may be held with all bodies involved in the support of the system.

6. ELECTRONIC STORAGE

- 6.1. All footage is stored electronically in the server room. There is no specified archive period, but the storage space available for CCTV footage typically allows us to hold the last 60 days of footage.
- 6.2. Due to the nature of the system and high data turn over and length of retention this system is not actively backed up.

7. DOWNLOAD MEDIA PROCEDURES

- 7.1. In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any download media used to record events from the hard drive must be prepared in accordance with the following procedures: -
 - 7.1.1. Each download media must be identified by a unique mark.
 - 7.1.2. Before use, each download media must be cleaned of any previous recording (when using external media).
 - 7.1.3. The System Manager will register the date and time of download media insertion, including its reference on the CCTV Log book.
 - 7.1.4. Download physical media required for evidential purposes must be sealed, witnessed and signed by a System Manager, then dated and stored in a separate secure evidence store. If a download 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.
 - 7.1.5. If download media is archived the reference must be noted on the CCTV Log Book.
 - 7.1.6. If media is exported to the schools IT systems it should be stored in the correct location with the appropriate access restriction allowing only authorised employees access.
 - 7.1.7. At no point should any CCTV footage be stored or transferred into any cloud storage platform or personal device
- 7.2. Images may be viewed by the police for the prevention and detection of crime and by authorised Officers.
- 7.3. A record will be maintained of the release of any download media to the police or other authorised applicants.
- 7.4. Viewing of images by the police must be recorded in writing.
- 7.5. 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 download media (and any images contained thereon) remains the property of the school, and download media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school 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.

- 7.6. The police may require the school 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.
- 7.7. Applications received from outside bodies (e.g. solicitors) to view or release images will be referred to the Local Authority's legal department.

Authorised Officers are defined as any member of the Governors, SSLT, Heads of Year or any deputy/Assistant thereof. Any additional staff that are needed to help in the aid of identifying an individual or group will have their identity confirmed and be recorded in the CCTV log book at the discretion of Authorised system managers or Delegated staff.

8. ASSESSMENT OF THE SYSTEM AND CODE OF PRACTICE

- 8.1. Performance monitoring, including random operating checks, may be carried out by the Head Teacher or the Data Controller.

9. BREACHES OF THE CODE (including breaches of security)

- 9.1. Any breach of the Code of Practice by school staff will be initially investigated by the Principal, in order for him/her to take the appropriate disciplinary action.
- 9.2. 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.

10. COMPLAINTS

- 10.1. Any complaints in relation to the school's CCTV system should be addressed to the Head Teacher.

11. ACCESS BY THE DATA SUBJECT

- 11.1. The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.
- 11.2. Requests for Data Subject Access should be made to the Head Teacher

12. PUBLIC INFORMATION

- 12.1. Copies of this policy will be available to the public from the school office by request.

13. SUMMARY OF KEY POINTS

- 13.1. This Policy will be reviewed every two years.
- 13.2. The CCTV system is owned and operated by Biddenham International School.
- 13.3. The CCTV system and images are not available to visitors except under circumstances as outlined in this policy.
- 13.4. The purpose of the system is for preventing, detecting crime, to protect pupils, staff and visitors. To increase personal safety and reduce the fear of crime & protect the school buildings and assets as outlined in this policy.
- 13.5. Liaison meetings may be held with the police and other bodies if required.
- 13.6. Footage may only be viewed by System Manager, Delegated staff, Police or supporting individuals as outlined in this policy.
- 13.7. Downloaded media will be used properly indexed, stored and destroyed after appropriate use, in accordance with the Data Protection Act.
- 13.8. Images may only be viewed by authorised School Officers and the police.
- 13.9. Downloaded media required as evidence will be properly recorded, witnessed and packaged before copies are released to the police.
- 13.10. Downloaded media will not be made available to the media for commercial or entertainment purposes. Nor stored on any cloud platform, personal device directly via file transfer or indirectly via recording the screen or similar. But images may be emailed internally by Authorised System Managers/Delegated staff as a means to identify individuals.

Review of Policy: May 2024

CCTV Access agreement for Authorised System Managers/Delegated staff/Authorised Officers

I agree to support & uphold the rules and regulations set out by the CCTV Policy & The ICO to the best of my ability. To only access,store data, log incidents in accordance with the procedures set out by the policy and report any misuse or complaints via the appropriate channels.

NAME

SIG

Date

Freedom of information (FOI) request (CCTV)

We will provide to you information which we are legally bound to under the following acts; Freedom of Information Act 2000, GDPR and Data Protection Act 2018, when requested through the form below.

Details of Applicant	
Title	
First name	
Surname	
Postal or e-mail address	
Telephone number	
<p>GDPR and Data Protection Act 2018 Biddenham International School and Sports College will treat your personal information in line with the GDPR and Data Protection Act 2018. In particular, the information you provide on this form will be used to monitor and fulfil your request. It will not be shared with any third parties, will be kept securely and will not be used for any other purpose.</p>	
If this application is being made on behalf of an organisation please provide details below.	
Organisation (Where applicable)	
Details of request	
<p>*Please use this section to tell us any details that may help us to locate the footage required, for example date, time, location, and a description of the information or incident. The more specific you can be the easier it will be for us to find the information.</p>	
How would you like to receive the information?	
<p>We normally provide copies of CCTV footage on a DVD. Please could you state how you would like to receive the requested information?</p>	
Come in to collect DVD	
Sent by post (recorded delivery) to the above address	
Other (please state)	

Please return this request form as follows:
 By post to: David Bailey
 Biddenham International School & Sports College
 Biddenham Turn

Biddenham
Bedford
Bedfordshire
MK40 4AZ

Or

Email to: david.bailey@biddenham.beds.sch.uk