

Closed Circuit Television (CCTV) Policy

This document should be read in conjunction with the following policies:

- Safeguarding Children Policy;
- Health and Safety Policy;
- Record Keeping and Retention Policy;
- Behaviour Policy;
- Staff Code of Conduct
- Concerns and Complaints Policy;
- Disciplinary Policy (**For Staff**);
- Grievance Policy (**For Staff**);
- Harpur Trust General Data Protection Regulation (GDPR) Policy

The policies can be found on the shared network drive (S:\School and HR Policies for staff) or <http://www.bedmod.co.uk/the-school/general-information/school-policy-documents/> for pupils and visitors (where applicable):

1. Introduction

- 1.1** The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) system at Bedford Modern School (the School). It serves also as a notice and a guide to data subjects (including all members of the School Community and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the system).
- 1.2** The system comprises of a number of fixed and dome cameras. The system does not have sound recording capability. All fixed cameras are in plain sight; the School does not use routinely recorded footage for covert monitoring or monitoring of private property outside the School grounds.
- 1.3** The overall responsibility of the system rests with the Director of Operations, who acts as the School's Data Controller.
- 1.4** The system is monitored and managed by the Estates Office. It can be monitored also over the network on computers by authorised users.
- 1.5** This policy will be subject to review from time to time, and should be read with reference to the Harpur Trust's General Data Protection Regulation (GDPR) Policy. The introduction of, or changes to CCTV monitoring will be advised to the School Community.
- 1.6** The CCTV system is registered with the Information Commissioner under the terms of the General Data Protection Regulation (GDPR).
- 1.7** The School complies with The Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. For further guidance, please review the Information Commissioner's CCTV Code of Practice (accessible here: <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>).

- 1.8** All authorised users are aware of the procedures that need to be followed when accessing the recorded footage. All users are trained by the School's Data Controller in their responsibilities under the CCTV Code of Practice, and are aware of the restrictions in relation to access to, and disclosure of, recorded footage.
- 1.9** The School's purposes of using the CCTV system are set out below, and having considered fully the privacy rights of individuals, the School believes these purposes are all in its legitimate interests. Footage captured for the purposes below will not be used for any commercial purpose.

2. Objectives of the System

- 2.1** To protect the School Community and members of the public with regard to their personal safety.
- 2.2** To protect the School buildings and equipment, and the personal property of the School Community and members of the public.
- 2.3** To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- 2.4** To monitor the security and integrity of the School site, deliveries and arrivals.
- 2.5** To monitor staff and contractors when carrying out work duties.
- 2.6** To monitor and support discipline among pupils in line with the Behaviour Policy.
- 2.7** To monitor and support discipline among Staff in line with the Disciplinary Policy and Staff Code of Conduct.

The planning and design of the system endeavours to ensure that it will give maximum effectiveness and efficiency but it is not possible to guarantee that it will cover or detect every single incident taking place in the areas of coverage.

3. Positioning / Siting of the Cameras

- 3.1** Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives (described above) and 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 to ensure that footage captured comply with the GDPR.
- 3.2** Adequate signage (CCTV warning signs) have been placed in prominent positions (for example, controlled areas/zones, external entrances to the School) to inform the School Community and members of the public that they are entering a monitored area, identifying the School and giving contact details for further information regarding the system **(Refer to Appendix A)**.
- 3.3** The School will make every effort to position cameras so that their coverage is restricted to the School premises, which may include outdoor areas, with the intention that no footage of public spaces are captured except to a limited extent at site entrances.
- 3.4** No footage will be captured from classrooms and areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.

4. Covert Monitoring

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

4.1.1 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;

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

4.2 In these circumstances pre-authorisation must be obtained from the School's Data Controller.

4.3 Covert monitoring must cease following completion of an investigation.

4.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example washrooms.

5. Maintenance of the System

5.1 The CCTV system will be operational 24 hours a day, every day of the year.

5.2 The System Manager (Deputy Bursar) will check and confirm that the system is properly recording and that cameras are functioning correctly, on a periodic basis, using the services of an external provider. **(Refer to Appendix B)**.

5.3 The system will be checked and (to the extent necessary) serviced no less than annually.

6. Supervision of the System – Live Footage

6.1 Staff who may conduct routine supervision of the system (live footage) may include day or night (outsourced) security, supervisors at the sports complex and all personnel who have authorised access to the systems. **(Refer to Appendix D)**.

7. Storage and Retention of CCTV Footage

7.1 The day-to-day management of footage will be the responsibility of the System Manager, or such suitable person as the System Manager shall appoint in his absence.

7.2 Footage will be stored for not exceeding thirty days and over-written automatically unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.

7.3 Where such footage is retained, it will be held securely in line with the GDPR and in accordance with the School's Record Keeping and Retention Policy.

7.4 Recorded footage will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose footage have been recorded.

8. Access to CCTV Footage – Recorded Footage

8.1 Access to recorded footage will be restricted to those users authorised to view, and will not be made more widely available. Access will be granted under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access). **(Refer to Appendix D).**

8.1.1 Subject Access Requests (SAR)

8.1.1.1 Individuals have the right to access their personal data held by the School under the GDPR.

8.1.1.2 All requests should be made in writing to the System Manager. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example; time, date and camera location, before the School can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable. Release of footage is at the School's sole discretion. **(Refer to Appendix C).**

8.1.1.3 The School will respond without undue delay and at least within one month of receipt. Where requests are more complex or numerous the School has the right under the GDPR to extend the period of compliance by a further two months.

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

8.1.2 Access to and Disclosure of CCTV Footage to Third Parties

8.1.2.1 Where footage is provided to Third Parties under 8.2 below, wherever practicable, steps will be taken to obscure footage of non-relevant individuals.

8.1.2.2 The footage may be used within the School's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

8.2 The System Manager must satisfy himself of the identity of any person wishing to view stored footage and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV footage:

8.2.1 Where required to do so by the Police or other relevant statutory authority;

8.2.2 To make a report regarding suspected criminal behaviour;

8.2.3 To enable the Designated Safeguarding Lead / Deputy Head (Pastoral) or appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;

8.2.4 To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents or guardians will be informed as part of the School's management of a particular incident;

8.2.5 To data subjects (or their legal representatives) pursuant to an access request under the GDPR and on the basis set out in 8.1.1 above;

8.2.6 To the School's insurance company where required in order to pursue a claim for damage done to insured property; or

8.2.7 In any other circumstances required under law or regulation.

8.3 Where footage is disclosed under 8.2 above, a record will be kept by completion of a CCTV Footage Subject Access Request Form, **(Refer to Appendix C)** including the person viewing the footage, the time of access, the reason for viewing the footage, the details of footage viewed, the retention of footage and a crime incident number (if applicable).

9. Other CCTV Systems

9.1 The School does not own or manage third party CCTV systems, but may be provided by third parties with footage of incidents where this in line with the objectives of the School's own CCTV policy or any other policies listed on page one.

9.2 Many pupils travel to School on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The School may use these in establishing facts in cases of unacceptable pupil behaviour, in which case the parents or guardians will be informed as part of the School's management of a particular incident.

9.3 Specific requests for viewing of CCTV footage is triggered by completion of a CCTV Footage Subject Access Request Form **(Refer to Appendix C)**.

10. Complaints and queries

10.1 Any complaints or issues in relation to the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to the System Manager.

11. Further Information

11.1 Further information on CCTV and its use is available from the following:

11.1.1 CCTV Code of Practice (published by the Information Commissioners Office).

11.1.2 Regulation of Investigatory Powers Act (RIPA) 2000

11.1.3 General Data Protection Regulation (GDPR)

Angelo Felice
ICT Services and Innovations Manager

Timothy Morley
System Manager (Deputy Bursar)

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Appendix A – CCTV Signage and Locations

It is a requirement of the GDPR to notify people entering a CCTV protected area that the area is monitored by CCTV and that footage is recorded. The School is to ensure that this requirement is fulfilled.

The CCTV sign includes the following:

- That the area is covered by CCTV surveillance and pictures are recorded.
- The purpose of using CCTV.
- The name of the School.
- The contact telephone number or address for enquiries.



The locations of individual CCTV Systems and signs are:

Manton Lane - North

- 1 - Reception
- 2 - Library
- 3 - Rutherford Building
- 4 - School House
- 5 - Sports Complex
- 6 - Estates Office
- 7 - Science Centre

Manton Lane - South

- 8 - Field Changing Room – Ground Floor Foyer

The locations of individual cameras are:

Manton Lane – North 1 – Reception / Lockers

- a) Middle of Lower Corridor
- b) Lockers (red) – Lower Corridor top end
- c) Lockers (red) and drink fountain – Lower Corridor top end
- d) Toward R L Doors
- e) Lockers (red) – adjoining male washrooms
- f) Corridor – middle of Lower Corridor / door to male washrooms
- g) Lockers (red) – adjoining male washrooms
- h) Lockers – adjoining male washrooms
- i) Common Room 1
- j) Common Room 3
- k) Lockers – Lower Corridor – far end
- l) First floor entrance to Library
- m) Main Reception – facing red doors
- n) Main Reception – facing staircase and towards Music corridor

2 - Library

- a) First floor lockers outside Library
- b) First floor entrance to Library
- c) Book shelves
- d) Entry / Exit

3 – Rutherford Building (all external)

- a) Front Entrance
- b) Right Entrance
- c) Front Entry Door
- d) Right Entry Door
- e) Servery
- f) Lockers
- g) Stairs
- h) First Floor Lobby
- i) Oakley Room (from Entrance)
- j) Oakley Room (from Office)
- k) Wilden Room
- l) Science Facility
- m) Kitchen Deliveries
- n) Rear of Science Facility
- o) Mid Parking
- p) Right Parking

4 – School House

- a) Door to Bursary / keypad - external
- b) Rear courtyard area – external
- c) Corner of School House towards road gates – external
- d) School House foyer / red staircase – internal
- e) Part rear pathway to and from School House – external
- f) Across front grassed area – external
- g) Across side grassed area / o/s Fitness Studio - external
- h) Across car park to car ports - external

5 – Sports Complex

- a) Front – external
- b) Accessible washroom / water dispenser – internal
- c) Foyer to base of stairs – internal
- d) Top of stairs down to foyer – internal
- e) Training Facility - cabinet corner – internal
- f) Training Facility – mirror corner – internal
- g) Training Facility – access corridor / under stairs – internal
- h) Canopy - external

6 – Estates Office

- a) Gyrotory – north side
- b) Roadway – uphill from EO
- c) Roadway – downhill from EO
- d) Gyrotory – south side
- e) Number plate camera – downhill from EO
- f) Extensive coverage - Dome
- g) Bicycle rack

7 – Science Centre

- a) Main Entrance – external
- b) Main Entrance Foyer – internal
- c) Atrium – Ground Floor – video wall / pendulum – west to east
- d) Atrium – Ground Floor – feature staircase – east to west
- e) First Floor – Circulation area by window
- f) Plant Room
- g) Walkway between Rutherford Building / Science Centre
- h) Rear Lawn

8 – Field Changing Room – Ground Floor Foyer

- a) Barrier
- b) Barrier and parking to side
- c) No. 52 – side
- d) Pool Doors – external
- e) Pool Foyer – changing room entrances
- f) Pool Foyer – internal
- g) Parking – mid site
- h) Field Changing Room – external
- i) Field Changing Room Foyer – internal
- j) King Room
- k) Parking – adj field
- l) Pedestrian Gate – from Slade Walk
- m) Vehicular Gate – from Slade Walk
- n) Grounds Compound

Appendix B – CCTV Checklist

The School has considered the need for using CCTV as outlined in Section **6 Objectives of the System**. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

Task	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			
There is a named individual who is responsible for the operation of the system.			
A system has been chosen which produces clear footage which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.			
Staff and members of the School community will be advised about the proposal to install CCTV equipment.			
Cameras have been sited so that they provide clear footage.			
Cameras have been positioned to avoid capturing the footage of persons not visiting the premises.			
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the System contact details are displayed on the sign(s).			
Footage from this CCTV system is securely stored, where only a limited number of authorised users may have access to them.			
The recorded footage will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.			
Except for law enforcement bodies, footage will not be provided to third parties.			
The School knows how to respond to individuals making requests for copies of their own footage. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.			
Regular checks are carried out to ensure that the system is working properly and produces high quality footage.			

Appendix C – CCTV Footage Subject Access Request

The following information is required before the School can provide copies of recorded footage for any purposes required as outlined in Section 8.2.

Please note that footage may contain the information of others that needs to be protected. Footage will be stored for not exceeding thirty days and over-written automatically unless the School considers it reasonably necessary, or if lawfully required by an appropriate third party such as the police or local authority.

To be completed by the individual requesting CCTV Footage

Reason for requesting CCTV footage: <i>(Please provide as much information as possible) i.e. Subject Access Request for where a person believes they may be identified, to make a report regarding suspected criminal behaviour, to assist the School in establishing facts in cases of unacceptable pupil behaviour, etc.</i>	
Name and address of person requesting footage: <i>(proof of ID may be required)</i>	
Description of incident or allegation <i>(Specify a description of yourself or others involved, clothing, activity, etc.)</i>	
Location of camera	
Date of footage sought	
Approximate time <i>(give a range if necessary)</i>	

Signature*.....

Print Name.....

Date

*** NB if requesting CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 or over, the child's authority or consent must be obtained except in circumstances where that would clearly be inappropriate and the lawful reasons to provide to the parent(s) outweigh the privacy considerations of the child.**

To be completed by the user permitted to view recorded CCTV footage

Where footage is disclosed under Section 8.2, the following record must be completed and kept with the CCTV Footage Subject Access Request Form (As completed by the individual requesting CCTV Footage).

Reason for viewing CCTV footage (Please specify):

- Where required to do so by the Police or other relevant statutory authority.
- To make a report regarding suspected criminal behaviour.
- To enable the Designated Safeguarding Lead / Deputy Head (Pastoral) or appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern.
- To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents or guardians will be informed as part of the School's management of a particular incident.
- To data subjects (or their legal representatives) pursuant to an access request under the GDPR and on the basis set out in Section 8.1.1.
- To the School's insurance company where required in order to pursue a claim for damage done to insured property.
- In any other circumstances required under law or regulation (please specify).

.....

Signatory of user viewing CCTV footage:

Signature.....

Print Name.....

Date of system access

Time of system access (give a range if necessary)

<p><u>Details of footage viewed:</u></p>

Is footage being retained?

YES

NO

Review Date

Crime incident number (if applicable).....

Appendix D – Users permitted to view recorded CCTV Footage

Only the following authorised users will be permitted to view alone any recorded footage. Care is taken when viewing footage to ensure that unauthorised or inappropriate personnel are not able to observe through windows or open doors.

- System Manager
- Estates and Facilities Manager
- Assistant to the Deputy Bursar
- ICT Services & Innovations Manager
- Deputy Head (Pastoral)
- Senior Deputy
- Director of Operations
- Headmaster