



## Surveillance Management Procedure

<b>Date of Last Review:</b>	<b>May 2020</b>
<b>Status:</b>	[Statutory / DPA Requirement / Non-Statutory]
<b>Committee:</b>	IG Board
<b>Staff Lead:</b>	<b>Manuela Gordea</b>
<b>Review Process:</b>	<b>Annually [or as appropriate]</b>
<b>Location:</b>	<b>R:\SLT\Policies</b>
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## **1. Introduction**

1.1. This procedure covers all matters relating to the use of video recording equipment for overt surveillance in and around all buildings where the school's employees work, pupils learn, parents visit the school on different occasions and which members of the public utilise. The CCTV System is designed to ensure maximum effectiveness and efficiency however it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage. Covert surveillance under the Investigatory Powers Act (2016) is not covered by this document.

## **2. Quick Reference Guide**

- Before undertaking surveillance consider if there is any other, less intrusive way, to meet your objective
- Always complete an impact assessment prior to carrying out any surveillance and consider whether you need to consult with those affected by the surveillance, or their parent/carers
- Ensure there is clear signage to make individuals aware that surveillance is in operation in line with regulatory requirements
- Ensure all surveillance recordings are held securely
- Ensure you have a process in place to enable access to surveillance recordings by individuals or investigators
- Do not keep surveillance data for longer than is necessary, and only retain in line with your retention policy
- Ensure relevant staff are trained to understand their responsibilities in relation to surveillance equipment and footage.

## **3. Policy References**

3.1. This procedure is a requirement of the following policies:

- Data Protection Policy

## **4. Surveillance Management Procedures**

Within the schools responsibility for monitoring Data Protection issues resides with the Data Protection Officer (DPO).

Responsibility for approving and reviewing this policy rests with the DPO, but responsibility for implementation of these procedures and for reporting performance issues under the policy rests with all employees who have involvement in the management of equipment. Responsibility for managing the deployment and use of cameras rests with identified members of staff with the appropriate authority to ensure procedures are adhered to.

4.2.1.**Scope and Review:** The siting of each CCTV camera that falls within the scope of this policy is subject to an Impact Assessment before it is commissioned or a retrospective Impact Assessment where it was already operational before policy and this procedure was approved. School sites will be subject to a review against the Impact Assessment criteria every two years, or sooner should there be any relevant change to the building use. A register of surveillance equipment is maintained.

4.2.2.**Ownership:** School site will have an identified owner who will take responsibility for the operation of all CCTV equipment on that premises or location.

4.2.3.**Purpose:** The Impact Assessment will establish whether or not there is a need for CCTV cameras in the first instance by recording the aims and benefits that the camera is meant to deliver and assessing whether there is any other solution that could achieve this.

4.2.4.**Quality:** The level of detail required of CCTV recordings will be assessed according to a categorisation scheme approved by the Home Office. The four quality levels of Monitoring, Detecting, Recognising and Identifying explain the various level of detail that is required for cameras to meet their stated purpose.

4.2.5.**Feedback:** Signage and explanatory publications will make building users aware of the purpose of the cameras and how to register feedback. Any complaints or concerns raised about the siting or usage of cameras will be captured and considered in a review. The outcomes of reviews will be communicated to those who have raised concerns, and to a wider audience if deemed appropriate

4.3.1.**Signage.** Signs explaining that CCTV recording is operational in the vicinity are clearly visible and legible in accessible areas of the building. They state who operates the equipment, what their purpose is and provide a contact number of the DPO for those with queries about usage and who wish to access recordings (Annex E).:

- The name of the Data Controller
- The name of the Data Protection Officer
- The purpose of the processing
- Data Subjects rights
- How to access the full privacy notice (QR code or web address)

4.3.2.**Explanatory Publications.** At each building there will be an appropriate supply of an approved leaflet which gives summary details of the policy and procedure including advice about how to make a formal request to view recordings.

4.4.1. **Retention of Recordings.** The School commits to retaining recordings for security from CCTV cameras under its control for 30 days. When this time period has expired, the data on the recorded tape or server will either be recorded-over, degaussed (deleting magnetic storage content) or disposed of – in any event deleted beyond the ability to reconstitute the content.

4.4.2. **Security:** Once a recording is complete, the tape or other storage medium is held in a secure container or on a secure server to which only authorised persons trained specifically in the policy and procedures have access.

4.4.3. **Access:** Instances of access to recordings are recorded in a log which can be produced on demand to the DPO, an authorised manager or Auditor/ Regulator and will be a complete record of access activity. This log will state:

- Dates of access,
- the period and location covered by the recording,
- the reason for access and
- Name, position and authority of those who have accessed recordings.
- Whether or not copies were made.

4.4.4. There is a single point within premises where a record of acceptance forms is stored. These will record signatures on approved forms of those who have had access and will support full auditability.

4.4.5. All access must be authorised by either the school's Headteacher, Deputy Headteacher or Network/Facilities Manager and supported by a CCTV access request form.

4.5.1. **The School's Usage:** We will only use recorded CCTV images for the purposes which we have identified below and communicated through signage and explanatory leaflets.

**Usage by other Organisations:** We will ensure that where recordings are accessed by or copies are provided to other organisations, this will also fall within these stated purposes, or otherwise within the law. Where copies are provided, the organisation requesting the material will be required to agree to manage the data in accordance with the Data Protection Act/ General Data Protection Regulations **Recording:** Where use is made of recordings by us or access granted or copies provided to other organisations, these instances are recorded and kept up to date in a central log available for inspection by anyone with the authority to do so wishing to monitor compliance with this policy. The reasons for use will be recorded and approved

4.5.2. The school uses CCTV equipment to provide a safe, more secure environment for pupils and staff. All recordings obtained and used as data are protected under DPA 2018. The systems are operated fairly and lawfully and are using technologies compatible with the DPA 2018 and GDPR.

4.5.3. The objectives of the CCTV scheme are: to increase personal safety of students, staff and visitors; to protect the school buildings and their assets; to monitor the security of the site; to support investigators in prosecuting offenders; to assist in managing the school;

#### **4.5.4. Statement of intent**

- a) Cameras will be used to monitor activities within the school premises, and for the purpose of securing the safety and wellbeing of the school, together with its visitors.
- b) Cameras are located in areas where the school has identified a need and where other solutions proved to be ineffective. The system is a justified and an effective solution and its use is a proportionate response to the problem. The system is used only for the purposes above mentioned.
- c) The live footage from a number of cameras in the CCTV system is available in key areas to enhance safeguarding arrangements.
- d) Key staff have been provided with the necessary induction in the use of the CCTV systems. Operators are aware that they are only able to use the equipment in order to achieve the purposes for which it has been installed. The members of staff with access to the recordings within the system are:
  - e) The Headteacher and Deputy Headteachers have the responsibility for the control of images and decides how the CCTV system is used.

The cameras siting has been set up so is meant to deliver the aims and benefits. The planning and design has endeavoured to ensure that the scheme will give maximum effectiveness and efficiency, so the information captured is usable and can meet its objectives in practice.

#### **4.6. Handling Access Requests**

4.6.1. **Rights.** Employees and members of the public whose images are captured by surveillance equipment have a right in law to access such recordings.

4.6.2. **Data Protection Law.** The Data Protection Act and the General Data Protection Regulations (from May 2018) provide statutory rights for individuals (employees and members of the public) to have access to information held by organisations about themselves. By the very nature of surveillance images there is likely to be information present on recordings that identifies not just the requesting Data Subject but other persons who had been present. This will require an assessment of whether or not third parties can be identified and if so what method and level of redaction may be necessary.

4.6.3. **Freedom of Information Act.** The Freedom of Information Act provides general statutory rights of access to information held by Public Authorities. In practice, the rules

governing this access regime will be applied where a requestor is asking for information about a person or persons other than themselves.

4.6.4.**Handling a Request.** Employees and members of the public will see signage and explanatory guidance at the locations where recordings are made that directs them to the appropriate contact to receive formal requests. Such requests should be directed to the school office.

## **5. Advice and Support**

5.1. If you have any issues over the clarity of these procedure, how they should be applied in practice, require advice about exemptions from the requirements or have any suggestions for amendments, please contact the school office.

## **6. Breach Statement**

A breach of this procedure is a breach of Information Policy. Breaches will be investigated and may result in disciplinary action. Serious breaches of Policy may be considered gross misconduct and result in dismissal without notice, or legal action being taken against you.