

CCTV Policy

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Introduction

The school recognises that CCTV systems can be privacy intrusive.

This policy will be reviewed every two years, or whenever a significant amount of new equipment is introduced, and a risk assessment put in place.

Employee Wellbeing

Tandridge Learning Trust is committed to promoting the positive mental, physical, and emotional wellbeing of its staff and recognises that enhancing individual wellbeing offers benefits not just to our staff but also to the wider communities within our organisation.

As such, when implementing this policy, consideration will be given to the impact on workload and wellbeing and take appropriate action to monitor, mitigate and support all those involved in its application.

Public Sector Equality Duties

Tandridge Learning Trust is committed to equality, both as an employer and a service provider. We welcome our general duty under the Equality Act 2010 to eliminate discrimination, to advance equality of opportunity and to foster good relations. We will ensure diligence in regard of our specific duties. This policy will be consistently and fairly applied to all stakeholders, with due regard for ensuring no-one experiences less favourable treatment in its application.

Objectives

The purpose of the CCTV system is to assist the school in reaching these objectives:

- a) To protect pupils, staff, and visitors against harm to their person and/or property.
- b) To increase a sense of personal safety and reduce the fear of crime.
- c) To protect the school buildings and assets.
- d) To support the police in preventing and detecting crime.
- e) To assist in identifying, apprehending, and prosecuting offenders.
- f) To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence.
- g) To assist in managing the school.

Purpose of This Policy

The purpose of this Policy is to regulate the management, operation, and use of the CCTV system (closed circuit television) at the schools.

Statement of Intent

Notification has been submitted to the Information Commissioner and the next renewal date has been recorded.

The CCTV system will seek to comply with the requirements of the Data Protection Act and the most recent Commissioner's Code of Practice.

The school will treat the system, all information, documents, and recordings (both those obtained and those subsequently used) as data protected under the Act.

The system has been designed so far as possible to deny observation on adjacent private homes, gardens, and other areas of private property.

Materials or knowledge secured as a result of CCTV recordings, will not be used for any commercial purpose.

Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design have 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.

Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible on the site and make clear who is responsible for the equipment.

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Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

Recorded images 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. In the absence of compelling a need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 31 days/1 month.

System Management

Access to the CCTV system and data shall be password protected.

The CCTV system will be administered and managed by the Tandridge Learning Trust Network Manager who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager the system will be managed by Tandridge Learning Trust IT Operations Manager.

The system and the data collected will only be available to the Systems Manager, his/her replacement and appropriate members of the senior leadership team as determined by the CEO, Director of Finance and IT, or Headteacher.

The CCTV system is designed to be in operation External cameras record 24 hours a day, 7 days a week. Internal cameras record 7 days a week, 6am – 9pm, though the school does not guarantee that it will be working during these hours.

The System Manager will check and confirm the efficiency of the system regularly and that the equipment is properly recording and that cameras are functional.

Cameras have been selected and positioned to best achieve the objectives set out in this policy by providing clear, usable images.

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.

Where a person other than those mentioned in the third paragraph (under System Management), requests access to the CCTV data or system, the System Manager must satisfy him/herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists access will be refused.

Details of all visits and visitors will be recorded in a system logbook including time/data of access and details of images viewed and the purpose for so doing.

Downloading Captured Data onto Other Media

To maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures:

- a. Each downloaded media must be identified by a unique mark.
- b. Before use, each downloaded media must be cleaned of any previous recording.
- c. The System Manager will register the date and time of downloaded media insertion, including its reference.
- d. Downloaded media required for evidential purposes must be sealed, witnessed, and signed by the System Manager, then dated and stored in a separate secure evidence store. If a downloaded media is not copied for the police before it is sealed, a copy may be made later providing that it is then resealed, witnessed, and signed by the System Manager, then dated and returned to the evidence store.
- e. If downloaded media is archived the reference must be noted.

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his/her replacement and the Headteacher and other authorised senior leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable, if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.

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 downloaded media (and any

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images contained thereon) remains the property of the school and downloaded 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.

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.

Applications received from outside bodies (e.g., solicitors or parents) to view or release images will be referred to the school's Data Protection Officer and a decision made by a senior leader of the school in consultation with the school's data protection officer.

Complaints About the Use Of CCTV

Any complaints in relation to the school's CCTV system should be addressed to the Headteacher.

Request for Access by The Data Subject

The Data Protection Act provides Data Subjects – those whose image has been captured by the CCTV system and can be identified - with a right to access data held about themselves, including those obtained by CCTV. Requests for such data should be made to data.protection@tandridgelearningtrust.co.uk and will be distributed to the appropriate school.

Public Information

Copies of this policy will be available to the public from the school office.

Appendix A – Camera Locations

The CCTV system used by the trust comprises of:

Site Name	CAMERA TYPE	LOCATION	SOUND (Y/N)	RECORDING CAPACITY (Y/N)	SWIVEL / FIXED (S/F)
Warlingham School	External	A4 Huts/Seating Area	N	Y	F
Warlingham School	External	All Weather courts	N	Y	F
Warlingham School	External	B Block Maple Alley	N	Y	F
Warlingham School	External	Business/DT	N	Y	F
Warlingham School	External	Drama/A2/Crunch	N	Y	F
Warlingham School	External	DT Playground	N	Y	F
Warlingham School	External	English Entrance	N	Y	F
Warlingham School	External	Front Lawn Seating	N	Y	F
Warlingham School	External	Front of House/Parking	N	Y	F
Warlingham School	External	In Gate – Main Car Park	N	Y	F
Warlingham School	External	Maple Room	N	Y	F
Warlingham School	External	Maths/E Block Entrance	N	Y	F
Warlingham School	External	Out Gate – Main Car Park	N	Y	F
Warlingham School	External	Outdoor Changing	N	Y	F
Warlingham School	External	PE Entrance	N	Y	F
Warlingham School	External	PE Playground	N	Y	F
Warlingham School	External	PE Rear/All Weather	N	Y	F
Warlingham School	External	Playground/SEN	N	Y	F
Warlingham School	External	Rear Hall/Crunch	N	Y	F
Warlingham School	External	Rear Kitchen/Compactor	N	Y	F
Warlingham School	External	Rear LRC/Rear DT	N	Y	F
Warlingham School	External	Rear PE	N	Y	S
Warlingham School	External	Reception/Car Park	N	Y	F
Warlingham School	External	Service Gate	N	Y	F

Site Name	CAMERA TYPE	LOCATION	SOUND (Y/N)	RECORDING CAPACITY (Y/N)	SWIVEL / FIXED (S/F)
Warlingham School	External	Service Road	N	Y	F
Warlingham School	External	Service Road/Minibuses	N	Y	F
Warlingham School	External	Sixth Form Car Park	N	Y	F
Warlingham School	External	Sixth Form Entrance	N	Y	F
Warlingham School	External	Sixth Form Pedestrian Gate	N	Y	F
Warlingham School	External	Sports Field	N	Y	S
Warlingham School	External	Tennis Courts (A)	N	Y	F
Warlingham School	External	Tennis Courts (B)	N	Y	F
Warlingham School	Internal	Art Corridor	N	Y	F
Warlingham School	Internal	Art Entrance	N	Y	F
Warlingham School	Internal	B Block Entrance	N	Y	F
Warlingham School	Internal	B14 Front	N	Y	F
Warlingham School	Internal	Business Corridor	N	Y	F
Warlingham School	Internal	Business Entrance	N	Y	F
Warlingham School	Internal	C1 – Front	N	Y	F
Warlingham School	Internal	C1 – Back	N	Y	F
Warlingham School	Internal	C19/Stairs	N	Y	F
Warlingham School	Internal	C2	N	Y	F
Warlingham School	Internal	D3	N	Y	F
Warlingham School	Internal	D5	N	Y	F
Warlingham School	Internal	DT Entrance	N	Y	F
Warlingham School	Internal	E Block - F/F Landing	N	Y	F
Warlingham School	Internal	E Block – G/F Corridor	N	Y	F
Warlingham School	Internal	E Block – S/F Corridor	N	Y	F
Warlingham School	Internal	E Block – S/F Landing	N	Y	F
Warlingham School	Internal	E Block Entrance	N	Y	F

Site Name	CAMERA TYPE	LOCATION	SOUND (Y/N)	RECORDING CAPACITY (Y/N)	SWIVEL / FIXED (S/F)
Warlingham School	Internal	English Entrance	N	Y	F
Warlingham School	Internal	Front Hall	N	Y	F
Warlingham School	Internal	Head of House Staircase	N	Y	F
Warlingham School	Internal	Humanities Corridor	N	Y	F
Warlingham School	Internal	LRC – Computers	N	Y	F
Warlingham School	Internal	LRC Corridor	N	Y	F
Warlingham School	Internal	M2 – Front	N	Y	F
Warlingham School	Internal	M2 – Rear	N	Y	F
Warlingham School	Internal	Maths Entrance	N	Y	F
Warlingham School	Internal	Maths Stairway	N	Y	F
Warlingham School	Internal	MFL Corridor	N	Y	F
Warlingham School	Internal	MFL Office/Stairs	N	Y	F
Warlingham School	Internal	Outside C Block M Toilet	N	Y	F
Warlingham School	Internal	Outside C Block F Toilet	N	Y	F
Warlingham School	Internal	PE/A3 Corridor	N	Y	F
Warlingham School	Internal	PE Office	N	Y	F
Warlingham School	Internal	Rear Hall	N	Y	F
Warlingham School	Internal	Reception	N	Y	F
Warlingham School	Internal	SEN/Science Stairs	N	Y	F
Warlingham School	Internal	SEN Corridor	N	Y	F
Warlingham School	Internal	Sixth Form Common Room – 1	N	Y	F
Warlingham School	Internal	Sixth Form Common Room – 2	N	Y	F
Warlingham School	Internal	Sixth Form Common Room – Kitchen	N	Y	F
Warlingham School	Internal	Sixth Form Study Room – Front	N	Y	F
Warlingham School	Internal	Sixth Form Study Room – Back	N	Y	F
Warlingham School	Internal	Sixth Form Study Room – Corner	N	Y	F

Site Name	CAMERA TYPE	LOCATION	SOUND (Y/N)	RECORDING CAPACITY (Y/N)	SWIVEL / FIXED (S/F)
Warlingham School	Internal	Sixth Form Foyer	N	Y	F
Warlingham School	Internal	Sports Centre – Reception	N	Y	F
Warlingham School	Internal	Student Services	N	Y	F
Tandridge Learning Trust	External	Pedestrian gate - TLT/Acorns Nursery	N	Y	F
Tandridge Learning Trust	External	In/Out Car Park Gates	N	Y	F
Hamsey Green Primary	External	Front Gate – Cars and pedestrians	N	Y	F
Hamsey Green Primary	External	Playground area	N	Y	F
Tatsfield Primary School	External				
Tatsfield Primary School	External				