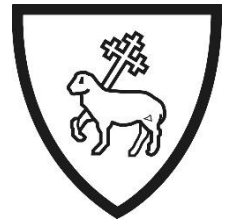


Date of review	September 2023
Next review	September 2026
Approval by	Principal
Review frequency	Three yearly
Date of approval	15.11.23



# Brockington College CCTV Policy

## 1. Introduction

- 1.1 Brockington College, a Church of England Academy, has at its heart a distinctive Christian ethos. Based on our Christian foundation and values we seek to promote a culture of developing every person and therefore every school policy is written from this perspective, with a commitment to learning and maturing in the context of communal and individual development.
- 1.2 We lay particular stress on the Christian values of compassion, forgiveness, justice, koinonia, learning, perseverance, respect and wisdom for individuals and across the school community.

## 2. Objectives

- 2.1 The purpose of this policy is to manage and regulate the use of the surveillance and CCTV systems at the college and ensure that:
  - we comply with data protection legislation, including the Data Protection Act 1998 and the General Data Protection Regulation (UK GDPR)
  - the images that are captured are useable for the purposes we require them for
  - we reassure those persons whose images are being captured, that the images are being handled in accordance with data protection legislation.
- 2.2 This policy covers the use of surveillance and CCTV systems which capture moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes:
  - make members of the school community feel safe
  - protect members of the school community from harm to themselves or to their property
  - deter criminality in the school
  - protect school assets and buildings
  - assist police to deter and detect crime
  - assist in the effective resolution of any disputes which may arise in the course of disciplinary or grievance proceedings
  - to assist in the defence of any litigation proceedings.
- 2.3 The CCTV system will not be used to:
  - Encroach on an individuals right to privacy
  - Monitor people in spaces where they have a heightened expectation of privacy (including toilet cubicles and changing rooms)
  - Follow particular individuals, unless there is an ongoing emergency incident occurring
  - Pursue any other purposes than the ones stated above.
- 2.4 CCTV Signs are erected around the building within prominent locations that clearly identifies that CCTV recording is in operation. Signs are located at the entrance gates, the building entrances and inside reception.

## 3 Legal framework

- 3.1 This policy has due regard to legislation and statutory guidance, including, but not limited to the following:
  - The Regulation of Investigatory Powers Act 2000

- The Protection of Freedoms Act 2012
- The UK General Data Protection Regulation
- The Data Protection Act 2018
- The Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The College Standards and Framework Act 1998
- The Children Act 1989
- The Children Act 2004
- The Equality Act 2010
- Human Rights Act 1998

3.2 This policy has been created with regard to the following guidance:

- Surveillance Camera Code of Practice (2021)

3.3 This policy operates in conjunction with the following college policies:

- Challenging Behaviour and Violence at Work Policy
- Data Protection Policy.

## 4 Roles and responsibilities

4.1 The role of the data protection officer (DPO) includes:

- dealing with freedom of information requests and subject access requests (SAR) in line with legislation, including the Freedom of Information Act 2000
- ensuring that all data controllers at the college handle and process surveillance and CCTV footage in accordance with data protection legislation
- ensuring that surveillance and CCTV footage is obtained in line with legal requirements
- ensuring consent is clear, positive and unambiguous. Pre-ticked boxes and answers inferred from silence are non-compliant with the UK GDPR
- ensuring that surveillance and CCTV footage is destroyed in line with legal requirements when it falls outside of its retention period
- keeping comprehensive and accurate records of all data processing activities, including surveillance and CCTV footage, detailing the purpose of the activity and making these records public upon request
- informing data subjects of how their data captured in surveillance and CCTV footage will be used by the college, their rights for the data to be destroyed and the measures implemented by the college to protect individuals' personal information
- preparing reports and management information on the college's level of risk related to data protection and processing performance
- reporting to the highest management level of the college, eg the governing board
- abiding by confidentiality requirements in relation to the duties undertaken while in the role
- monitoring the performance of the college's privacy impact assessment (PIA), and under the UK GDPR the data protection impact assessment (DPIA), and providing advice where requested
- presenting reports regarding data processing at the college to senior leaders and the governing board.

4.2 Brockington College, as the corporate body, is the data controller. The governing board of Brockington College therefore has overall responsibility for ensuring that records are maintained, including security and access arrangements in accordance with regulations.

4.3 The operations manager deals with the day-to-day matters relating to data protection and thus, for the benefit of this policy will act as the data controller. The role of the data controller:

- processing surveillance and CCTV footage legally and fairly
- collecting surveillance and CCTV footage for legitimate reasons and ensuring that it is used accordingly

- collecting surveillance and CCTV footage that is relevant, adequate and not excessive in relation to the reason for its collection
- ensuring that any surveillance and CCTV footage identifying an individual is not kept for longer than is necessary
- protecting footage containing personal data against accidental, unlawful destruction, alteration and disclosure – especially when processing over networks.

4.4 The role of the principal includes:

- Take responsibility for all day-to-day leadership and management of the CCTV system
- meeting with the DPO to decide where CCTV is needed to justify its means
- conferring with the DPO with regard to the lawful processing of the surveillance and CCTV footage
- reviewing the Surveillance and CCTV Policy to ensure it is compliant with current legislation
- monitoring legislation to ensure the college is using surveillance fairly and lawfully
- communicating any changes to legislation with all members of staff.

4.5 The Network manager will:

- Take care of the day-to-day maintenance and operation of the CCTV system
- Oversee the security of the CCTV system and footage
- Check the system for faults and security flaws termly
- Ensure the data and time stamps are accurate termly

## 5 The Data Protection Act 2018 and UK GDPR

5.1 The Data Protection Act 2018 relates to data processing of all types. The definition of data under the Act is “Personal data” means any information relating to an identified or identifiable living individual. It requires the person to be identified by a number of means, which can include photographic or video footage.

5.2 The definition of Processing is much wider in its scope than the previous legislation “Processing”, in relation to information, means an operation or set of operations which is performed on information, or on sets of information, such as—

- (a) collection, recording, organisation, structuring or storage,
- (b) adaptation or alteration,
- (c) retrieval, consultation or use,
- (d) disclosure by transmission, dissemination or otherwise making available,
- (e) alignment or combination, or
- (f) restriction, erasure or destruction

5.3 Data in the case of CCTV recordings is in the form of recorded images of individuals that can be identified from these images.

5.4 Having regard for these definitions, it will be recognised that the use of CCTV for surveillance purposes is encompassed by the requirements of the Data Protection Act.

## 6 Security

6.1 Access to the surveillance system, software and data will be strictly limited to authorised operators and will be password protected. Operators of the system are aware of the need for confidentiality and that recorded information must be kept secure and available only to those directly connected with achieving the objectives of the system.

6.2 The main control facility is kept secure and locked when not in use.

6.3 Surveillance and CCTV systems will be tested for security flaws annually to ensure that they are being properly maintained at all times.

- 6.4 Surveillance and CCTV systems will not be intrusive.
- 6.5 Any unnecessary footage captured will be securely deleted from the college system.
- 6.6 Any cameras that present faults will be repaired immediately as to avoid any risk of a data breach.
- 6.7 The CCTV system can be accessed on the personal computers of the site manager and CAB Room B (location used by all staff other than the premises team).
- 6.8 Adequate cyber security measures will be in place to protect footage from cyber-attacks.

## **7 Retention, traceability and record keeping**

- 7.1 The archive period of recordings is no longer than is necessary to achieve the objectives of the system. The archive period is no longer than 30 days.
- 7.2 Where retention is needed beyond the standard retention period, video files may be exported by one of the staff members detailed above and stored in a specified location on the network. Files in this area:
  - are only accessible by individuals documented within this policy
  - must be logged using the supplied spreadsheet including date exported, and date to be deleted
  - should be removed as soon as no longer required.
- 7.3 Original recordings are only found:
  - within the recognised secure storage system
  - operational in the recording device
  - secured in an evidence bag.
- 7.4 Copies of recorded information are strictly controlled and only made in relation to incidents the subject of the investigation or a valid subject access request. Copies are only issued by the network manager or operations manager to those directly connected with achieving the objectives of the system. Any recorded images that are copies to a third party data source are identified by a unique number and appropriate request form signed by appropriate persons.

## **8 Covert Recording**

- 8.1 Because fairness requires that we install signs to make individuals aware that they are entering an area where their images are recorded, it follows that failure to provide signs is a breach of the Data Protection Act.
- 8.2 However, we are able to rely on an exemption of the Data Protection Act which states that personal data processed for reasons of prevention and detection of crime and apprehension and prosecution of offenders are exempt. Providing that the following criteria are met:
  - We have assessed that if we had to inform individuals that recording was taking place it would prejudice our objective.
  - We have reasonable cause to suspect specific criminal activity is taking place or actions that could result in a serious breach of staff or volunteer behaviour expectations is taking place.
  - That covert processing is only carried out for a limited and reasonable period of time and relates to the specific suspected criminal activity.
- 8.3.1 We have decided in principle that we wish to adopt covert recording. We have a clear documented procedure which sets out how we determine whether the use of covert recording

is appropriate in an individual case. A confidential appendix regarding our decision that covert recording is appropriate is lodged with the Head Teacher/ Chief Executive Officer

## **9 Use of Recordings**

9.1 The CCTV recordings may be used for:

- Prevention and detection of crimes, in the school and its environs
- Pupil behaviour management, discipline and exclusions
- Staff disciplinary and associated processes and appeals.

9.2 When using CCTV footage for any of the above purposes it shall be permissible to access and enable relevant third parties to see the footage using a suitably secure device or media, subject to notification within Appendix A below. It will not be common practice to release CCTV footage unless satisfactory evidence for a secure legal basis can be provided. This is authorised within Section 115, Crime and Disorder Act 1998.

9.3 All requests for access should be made in writing to the system manager, the Principal, and be specific to a date and timeframe.

9.4 Any disclosure will be done in line with UK GDPR and Data Protection.

9.5 The school cannot guarantee disclosure of footage when made under a Subject Access Request due to:

- Lack of technical resources available in order to blur or redact the footage;
- The release of footage would prejudice an ongoing investigation;
- Other identifiable individuals have not consented.

## Code of Practice Policy Statement

This code of practice policy statement relates to the Closed Circuit Television System installed within Brockington College.

The system manager is the Principal of Brockington College who has the overall responsibility of ensuring the management of the systems recorded images, maintenance and training of persons authorised to use the system and who has responsibility as Data Controller for the CCTV system.

Other authorised personnel trained to operate the system are:

- The Site Manager
- Heads of Years
- Pastoral Managers
- The senior Leadership Team
- IT support.

The objectives of the system are to assist in the detection of crime, provide evidence of crime and to deter those who have criminal intent

- to give confidence to staff and visitors that they are in a secure environment
- to provide management information relating to Health & Safety matters
- to support pupil behaviour and discipline management.
- to record actions of staff, pupils and school visitors that may be used for disciplinary or monitoring purposes

### System

The system comprises of the following primary items:

Recording media type	Digital Recorder DVR recording system		
The system records images from	Colour and Black and White cameras		
Monitors			
Fixed cameras			
Moveable cameras			
Covert cameras			
CCTV signs			

The operating manuals relating to the specific items of equipment have been compiled and are located in the respective CCTV Server Room. It is the responsibility of the Principal to ensure that all authorised staff are aware of the function of the system and capable of operating the system.

### General Principles

The principles detailed in the CCTV Code of Practice 2021 are observed in the operation and management of the system.

## APPENDIX A

### SUBJECT ACCESS REQUEST

Date of footage	
Start time of footage	
End time of footage	
Cameras of required footage	
Current time on recorder	
Time using speaking clock	
Person requesting footage	
Copy of footage has been recorded to DC/DVD/USB	
Serial number of copied media disk	

The above information and associated CCTV footage has been compiled on behalf of: Brockington College

The footage detail above has been compiled in accordance with the CCTV code of practice 2021. It is the recipient's responsibility to store and dispose of the recorded media in accordance with the CCTV Code of Practice 2008 and the recipients take full responsibility for the safe keeping of the footage as detailed above. A copy of the codes can be obtained by visiting [www.ico.gov.uk](http://www.ico.gov.uk).

Brockington College will maintain a log of access requests detailing who the requests have been made by.

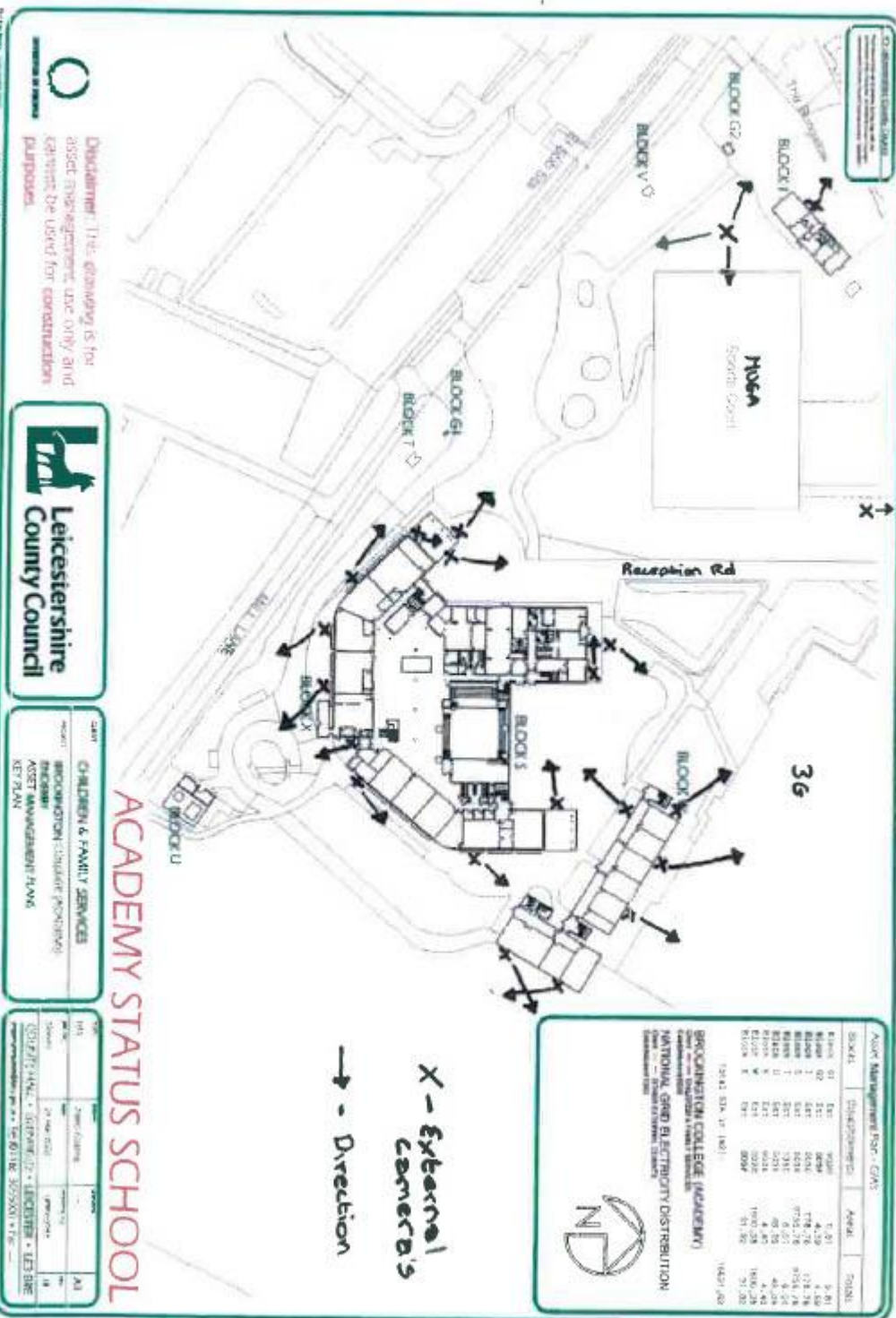
#### Issuer of the above footage

Name	Signature	Date

#### Recipient of the above footage

Name	Signature	Date
Address		
Identification		

# External Camera Locations



**Disclaimer:** This drawing is for asset management use only and cannot be used for construction purposes.



**CHILDREN & FAMILY SERVICES**  
 EDUCATION (SCHOOL PROVISION)  
 ASSET MANAGEMENT PLANS  
 KEY PLAN

## ACADEMY STATUS SCHOOL

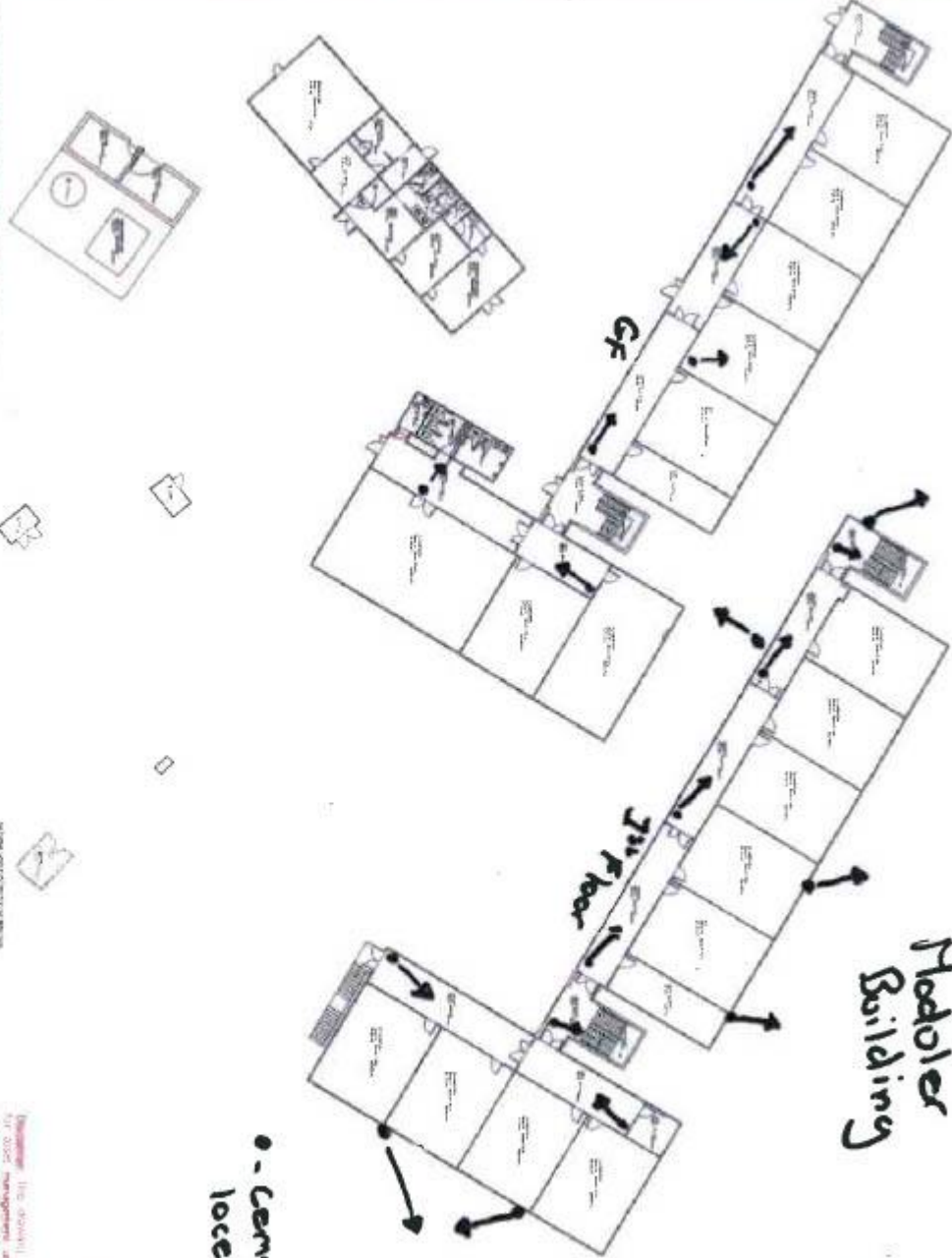
**Asset Management Plan - GMS**

Block	Description	Area	Cost
BLOCK 1	1000	1.01	5.81
BLOCK 2	1000	1.01	1.28.28
BLOCK 3	1000	1.01	7.78.78
BLOCK 4	1000	1.01	7.78.78
BLOCK 5	1000	1.01	7.78.78
BLOCK 6	1000	1.01	7.78.78
BLOCK 7	1000	1.01	7.78.78
BLOCK 8	1000	1.01	7.78.78
BLOCK 9	1000	1.01	7.78.78
BLOCK 10	1000	1.01	7.78.78
<b>TOTAL</b>	<b>1000</b>	<b>1.01</b>	<b>7.78.78</b>

**BRACKENHURST COLLEGE (MANAGER)**  
 NATIONAL GRID ELECTRICITY DISTRIBUTION  
 (NATIONAL GRID ELECTRICITY DISTRIBUTION)

X - External Camera's  
 → - Direction





Moduler Building

o - Centre location

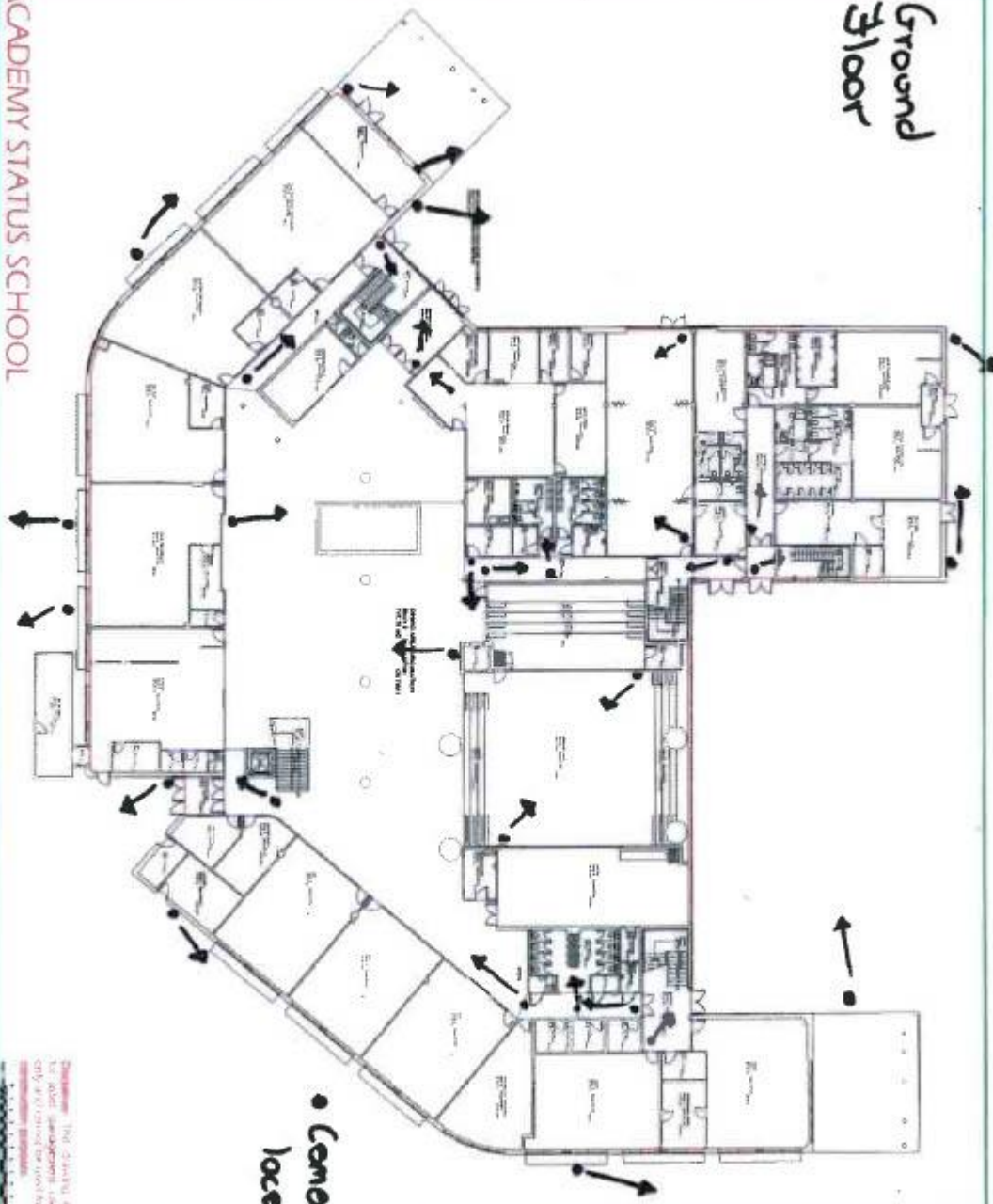


Disclaimer: The drawings, plans, specifications, and other documents prepared by the County of Los Angeles are for informational purposes only and do not constitute a contract. The County of Los Angeles is not responsible for any errors or omissions in these documents.

**Los Angeles County**  
Public Works Department  
Engineering Division

ACADEMY STATUS SCHOOL

Ground Floor



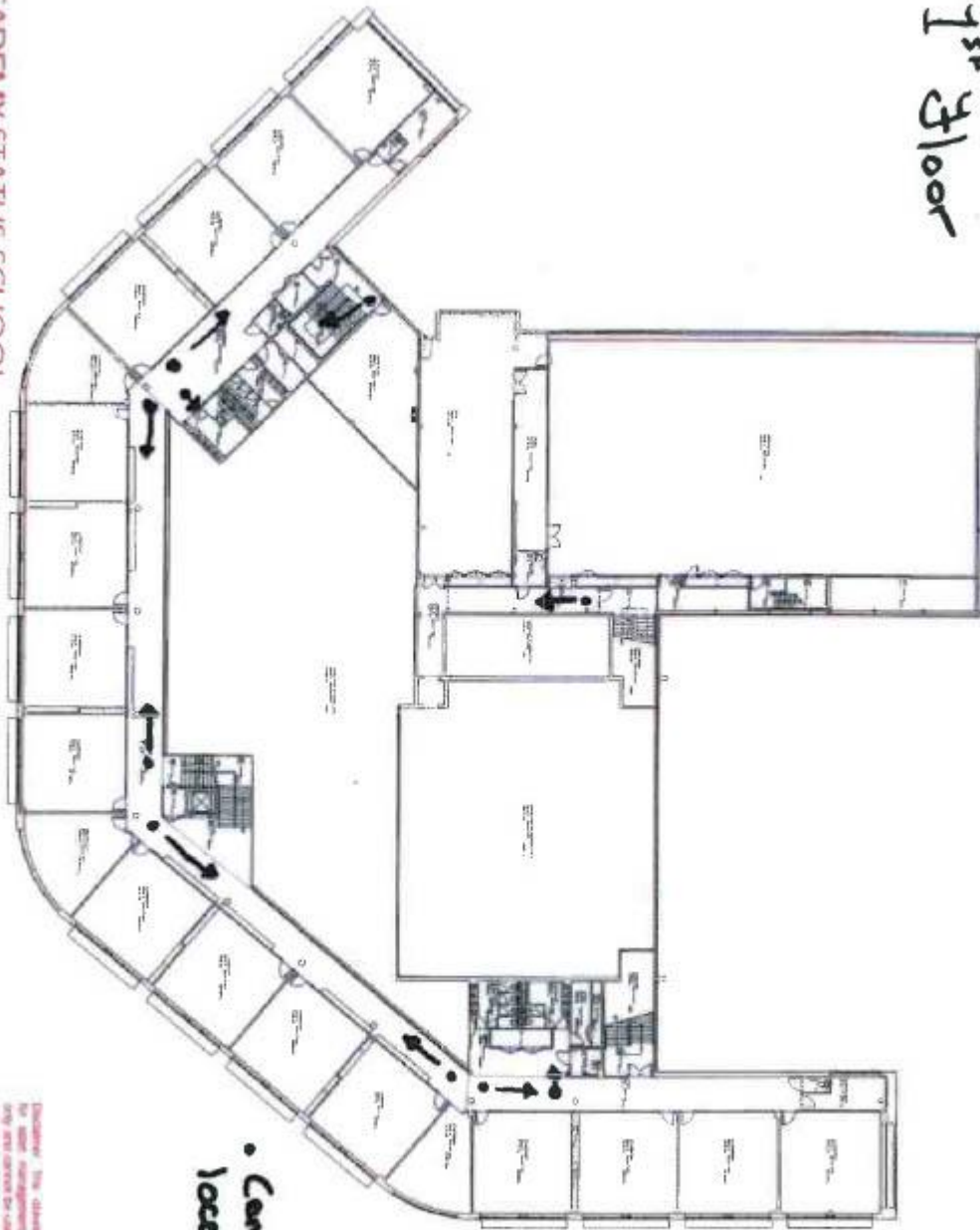
• Camera location

Disclaimer: The drawings & any other information are only a guide and do not constitute a contract. The client is responsible for the accuracy of the information provided.

Leicestershire County Council

1<sup>st</sup> Floor

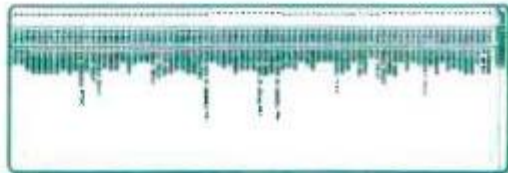
ACADEMY STATUS SCHOOL



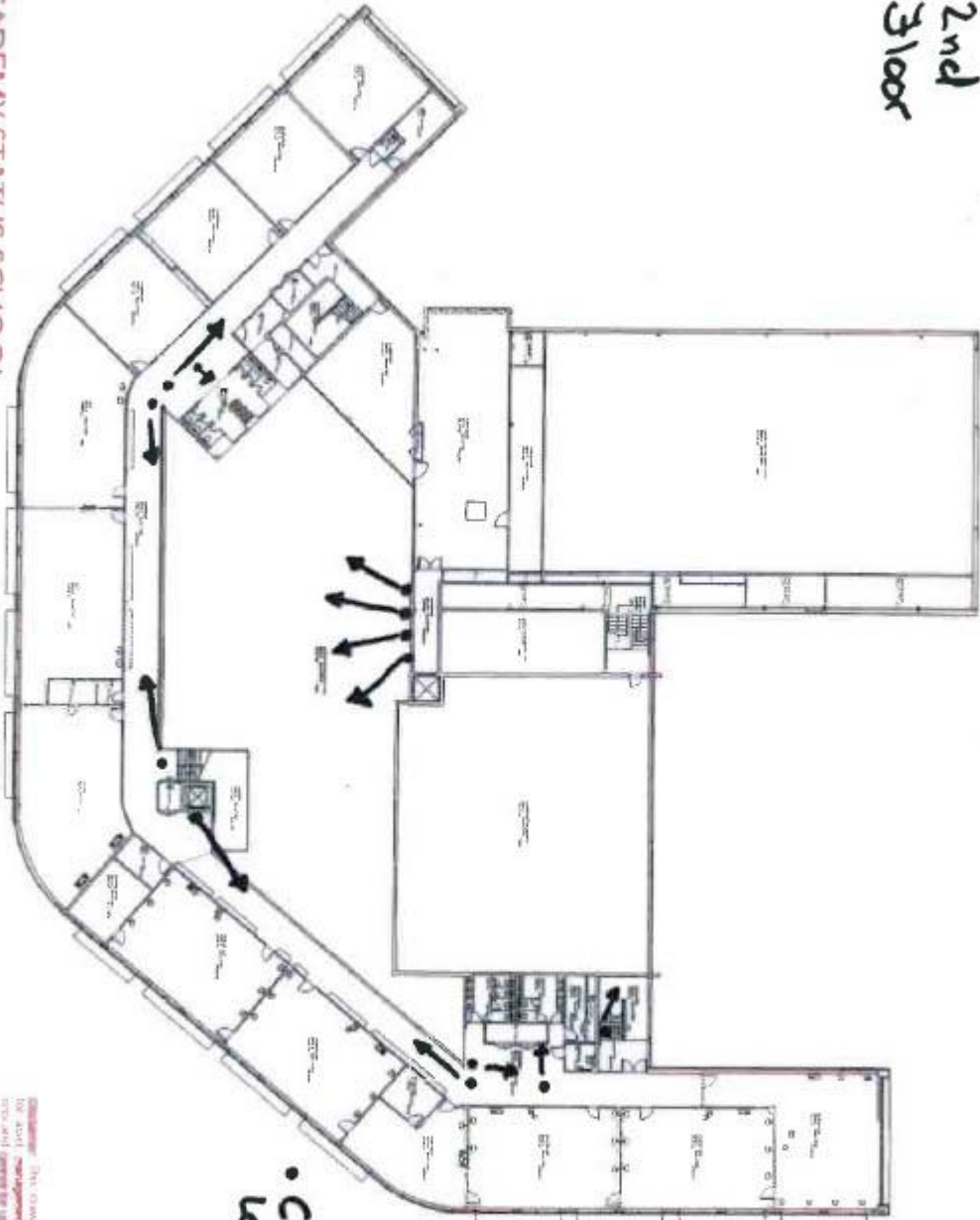
• Camera locations

Disclaimer: The drawing is for information only and does not constitute a contract. The drawing is subject to change without notice. The drawing is not to be used for any other purpose.

The block contains two logos. On the left is the logo for the University of Utah, featuring a stylized 'U' and the text 'The University of Utah'. On the right is the logo for Salt Lake County Council, featuring a stylized 'S' and the text 'Salt Lake County Council'.



2nd  
Floor



• Camera  
Locations

Legend: The camera is  
 located in the room  
 and the arrows show  
 the field of view

Leicestershire  
 County Council

0

Room No.	Room Name	Camera ID	Field of View
201	Office	201-01	Office
202	Office	202-01	Office
203	Office	203-01	Office
204	Office	204-01	Office
205	Office	205-01	Office
206	Office	206-01	Office
207	Office	207-01	Office
208	Office	208-01	Office
209	Office	209-01	Office
210	Office	210-01	Office
211	Office	211-01	Office
212	Office	212-01	Office
213	Office	213-01	Office
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