



## Policy on the Management of CCTV

### **POLICY STATEMENT**

This policy sets out Highfield & Brookham School's approach to the use of CCTV in the workplace and its effect on employees, pupils and visitors.

### **PURPOSE AND SCOPE**

The primary use of CCTV is to protect the property and people within the Schools.

It is not the School's intended purpose to use CCTV for monitoring the work of employees or finding out whether they are complying with the organisation's policies and procedures.

Cameras are installed in the Schools for the purpose of detecting and preventing crime and damage. It will also be used for the purposes of safeguarding children and staff. It may be shared with law enforcement bodies in the prevention, detection and prosecution of a crime.

### **PRINCIPLES**

The images of individuals recorded by CCTV cameras in the workplace are personal data for the purposes of data protection legislation. The School is committed to comply with its legal obligations and seeks to comply with best practice suggestions from the Information Commissioner's Office.

The following principles apply:

- CCTV will be installed only when and where it is a necessary and proportionate way of dealing with a problem;
- The Schools will ensure that all cameras are set up in a way that ensures that there is minimal intrusion of privacy, and that any intrusion is fully justified;
- Signs will be displayed prominently to inform staff, pupils and visitors that CCTV is in use;

- No images and information will be stored beyond those which are strictly required for the stated purpose of a surveillance camera system;
- Access to retained images and information will be restricted, with clearly defined rules on who can gain access;
- It is not the intention that CCTV in Schools be used to monitor the quality and amount of work completed by an employee;
- Surveillance images and information will be subject to appropriate security measures to safeguard against unauthorised access and use.

## **MONITORING AND REVIEW**

A formal review of this policy will take place every 2 years or sooner if there is a policy need or legislative change.

This policy does not form part of employees' terms and conditions of employment and may be subject to change at the discretion of the Senior Management Teams.

## **CCTV GUIDELINES**

### **CCTV FOOTAGE**

CCTV is located in the following places within the Schools:

- Internally 1:1 practice rooms within the Highfield Music School
- Externally on the Main School Building facing the Highfield Atrium
- External on the Lodge at the entrance to the Schools facing Highfield Lane and the Main Drive
- Externally on the Swimming Pool building looking towards the Grounds Yard
- Externally on the first lighting column of the Astro looking at the entrance to the Astro and the pitch

Live CCTV footage can be viewed by:

- The IT Manager;
- The Estate Manager

Recorded CCTV footage can be reviewed (not deleted or amended) by:

- The IT Manager;
- The Estate Manager
- Headmaster / Head Teacher
- HR Manager
- The Police under supervision of the Estate Manager

- Other School officials by way of permission of the Estate Manager

Camera surveillance will always be maintained and footage continuously recorded and held on system memory for a period of up to 30 days.

To maintain and preserve the integrity of any External Storage Device (ESD) used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention will be strictly adhered to:

- Each ESD must be identified by a unique reference number;
- Before using, each ESD must be cleared of any previous recording;
- The person responsible for recording will register the date and time of the ESD recording, including the ESD reference number;
- An ESD required for evidential purposes, be it internal or external, must be sealed, witnessed, signed by the member of staff responsible for the recording, dated and stored in a separate, secure evidence ESD store or archive. If an ESD 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, signed by the member of staff, dated and returned to the evidence ESD store or archive.

Notwithstanding their statutory rights under the data protection legislation, staff, pupils (parent of) and visitors whose images are recorded may request to view those images of themselves and to be provided with a copy of the images within 14 days of their request, if they have not been automatically deleted.

Staff making such a request should write to the Estate Manager providing the relevant time and date of the image, so that they may be easily identifiable.

## **SCHOOL STAFF / EMPLOYEES**

As stated, the primary purpose of CCTV is to protect the property and people of Highfield & Brookham Schools. However, when CCTV is installed in a workplace, it is likely to capture pictures of employees and workers, even if they are not the main subject of surveillance.

CCTV evidence may be used as part of an employee investigation where, in the reasonable belief of the School, it will assist in the effective resolution of disputes which arise in the course of disciplinary and grievance proceedings. It may also be used to assist in the defence of any civil litigation including employment tribunal proceedings. In such cases the footage must be requested by the Human Resource (HR) Manager. In the case of a contractor or non-School employee any evidence identified may be passed to a third party, such as the individual's employer.

In accordance with the CCTV Code of Practice, where footage is used in disciplinary proceedings, the footage will be retained, and the worker allowed to see and respond to the images.

## **SUBJECT ACCESS REQUESTS**

Data subjects may make a request for disclosure of their personal information and this may include CCTV images. A data subject access request is subject to the statutory conditions in place from time to time and should be made in writing, as set out in our Data Retention Policy.

In order for us to locate relevant footage, any requests for copies of recorded CCTV images must include the data and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.

The School reserves the right to obscure images of third parties when disclosing CCTV data as part of a subject access request, where it is considered necessary to do so.

## **COMPLAINTS**

Complaints about the operation of the CCTV system should be addressed initially to the HR Manager.