

BOLTON SCHOOL



CLOSED CIRCUIT TELEVISION POLICY AND PROCEDURE

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Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) systems at Bolton School Foundation.

There are four CCTV systems in operation comprising a number of fixed, dome and vehicle cameras located around the school campus, sites controlled by Bolton School and on school vehicles. Each of the CCTV systems is owned by Bolton School Foundation.

Details of each of the systems in operation and the corresponding 'responsible person' can be found in Appendix 1.

This Policy follows Data Protection Act guidelines and will be subject to review every two years.

Objectives of the CCTV schemes

- To increase personal safety of staff, pupils, visitors and clients and reduce the fear of crime
- To protect the school buildings, their assets and vehicles
- To support the Police in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders
- To assist in managing the school and its grounds and what takes place therein

Statement of intent

The CCTV schemes are registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's CCTV Code of Practice.

The school will treat the systems and all information, documents and recordings obtained and used as data which is protected by the Act.

Cameras will be used to monitor activities within the school grounds and other sites controlled by Bolton School Foundation. They will be used to identify criminal activity anticipated, perceived to be or actually occurring, and for the purpose of securing the safety and well-being of the schools' pupils, staff and its visitors.

Responsible persons have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.

CCTV will not be used specifically for monitoring the work of employees or the activities of pupils, parents and visitors. CCTV evidence may be used in the event that the facts of an incident need to be clarified or in disciplinary proceedings, against an employee where such evidence tends to show, in the reasonable belief of the employer, that the employee has been guilty of misconduct. The employee or other individual e.g. parents, (perhaps with their child) involved in the matter/incident will be given the chance to see and respond to the images in these circumstances.

Covert CCTV will only ever be set up for the investigation or detection of crime or serious misconduct. The use of covert CCTV will be justified only in circumstances where the investigator has reasonable suspicion that the crime or serious misconduct is taking place and where CCTV use is likely to be a proportionate means of securing evidence. The use of covert CCTV can only be authorised by a Senior Officer.

Materials or knowledge secured as a result of CCTV 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 and with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design of the CCTV systems has endeavoured to ensure that the systems 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, have been placed at all access routes to areas covered by the CCTV.

Operation of the system

The schemes will be administered and overseen by the Clerk and Treasurer or nominees, in accordance with the principles and objectives expressed in the CCTV Code of Practice and this policy.

The day-to-day management will be the responsibility of the relevant responsible person for each system.

The CCTV systems will be operated 24 hours each day, every day of the year.

The relevant responsible person for each system will be required to regularly check and confirm the efficiency of the system and in particular that the equipment is properly recording and that cameras are working.

An impact assessment of each of the systems will be conducted on an annual basis by the relevant responsible person.

Image monitoring procedures

Image monitoring may be maintained at all times.

Viewing of live images on monitors will be restricted to those listed in Appendix 1 unless the monitor displays a scene which is also in plain sight from the monitor location.

Cameras will be pointed and focused on several points/areas agreed by the relevant responsible person. Only the relevant responsible person will modify or authorise the modification of camera positions. An Impact Assessment, (see appendix 2), should be completed in the event of a camera position being modified.

Image storage procedures

The responsible person for each CCTV system will ensure that the images are only held for a maximum of 31 days and are then overwritten. On occasions the images may be retained for longer when required for evidential purposes, in which case they will be retained until no longer needed.

Access to the stored images will be strictly controlled by a password system managed by the relevant manager.

Routine viewing of recorded images will be limited to:

- The relevant responsible person or in their absence a nominated deputy (see appendix 1)
- The Clerk and Treasurer or her nominee.

When circumstances require, the relevant responsible person and the Clerk and Treasurer will have authority to allow other members of staff to view recorded images. The names of staff other than those listed above who view the recorded images will be recorded in an Access Register, see appendix 3, held by the relevant responsible person.

Images may be viewed by the Police for the prevention and detection of crime, or by the insurers if a claim has been made against the school. A record will be made in the Register (maintained by the relevant responsible person) of the viewing. Requests by the Police will only be actioned under Section 29 of the Data Protection Act 1998. Should images be required as evidence, a copy may be released to the Police under their evidence guidelines. A record of this release will be made in the Register.

Images will only be released to the Police on the clear understanding that they remain the property of the school, and both the disk or file and information contained on it are to be treated in accordance with this policy. The school will also retain the right to refuse permission for the Police to pass to any other person the disk or any part of the information contained thereon.

Applications received from outside bodies (e.g. solicitors, insurers) to view or release disks will be referred to the Clerk and Treasurer. In these circumstances disks will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, an insurance claim, a subject access request, or in response to a Court Order.

Breaches of the Policy (including breaches of security)

Any breach of the CCTV Policy by staff will be investigated under the school's Disciplinary Policy and Procedure.

Complaints

Any complaints about the school's CCTV system or application of this policy should be addressed in writing to the Clerk and Treasurer.

Public Information

This policy will be made available to the public on the School website.

Access by the Data Subject

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to see data held about themselves, including those obtained by CCTV. Requests for Data Subject Access should be made to the Clerk and Treasurer in writing either using the Data Subject Access Request Form, see appendix 4, or providing the information requested in the form. Applicants will receive a response within 40 calendar days of the date the request was received by the School. The school will charge £10 per request.

Appendix 1

Bolton School CCTV Responsible Persons

Oversees the systems	Clerk and Treasurer				
Point of contact for Subject Access Requests					
CCTV Locations	School Campus	Arts Centre	Lester Road and School Vehicles	Nursery	ICT Department
Responsible for System Reviews, Storage & Access to Images	Health, Safety and Facilities Manager	Events Manager and Leisure Services Manager	Transport Manager	Nursery Manager	Head of ICT Services
System Users (Can view images)	Security Officers Sergeants Receptionists	Services Bursar, Events Manager, Assistant Events Manager, Events Operations Manager, Leisure Services Manager, Leisure Operations Manager	Services Bursar Transport Administrator	Deputy Nursery Manager Team Leaders Administrators Receptionist	Head of ICT Services, ICT Infrastructure Manager, Other ICT Staff

(A separate sheet should be completed for each area, giving precise details of the use of surveillance CCTV and the data collected from that area. It may be adequate to group together some areas where the information to be recorded is entirely or partially common, without loss of specific reference.)

C. Impact assessment for use of CCTV in (area)

Purpose(s) for use of surveillance CCTV:

Advantages of use of CCTV over other possible methods e.g. additional lighting, increased patrols:

Assessment of amount of equipment used and time equipment is active:

Specific ways in which data collected will be used, including restrictions:

For stored data, the method used, the maximum length of time of storage, and how the data might be used:

All personnel having immediate access to data collected and stored, as part of specific duties:
(Included are any servicing company's personnel with general access)

Details of how data may be processed, by whom and for what purpose(s):

Details of further personnel who may gain temporary access to data as part of their duties:

Methods of notification of the presence of surveillance CCTV and other information channels e.g. signage, induction:

Details of all method(s) by which images, or collected data from CCTV may be streamed to any outside agency or other parties, if relevant. Restrictions on access are also included:

Where an outside agency is entirely responsible for the operation and control of the CCTV equipment, its monitoring and the collection and use of data collected, all relevant and necessary details:

Assessment of any possible impact of CCTV surveillance on the right to privacy, performance or general well-being of any individuals:

Other relevant information:

Does the system and arrangements still comply with the School's CCTV Policy? If no, what action is to be taken, by when and by whom:

Appendix 3 - Bolton School CCTV Access Register

Date access granted	Name of individual to whom access was granted	Dates & times of images accessed	CCTV System and cameras from which images were shown	Purpose for which access to images was granted. NB Provide Crime Reference Number where relevant.	Has a copy of the images been provided? If so, in what format?	Has the individual to whom access was granted been provided with a copy of the CCTV Policy and received an explanation of the terms under which the images are provided?	Name of individual who granted access NB This should only be a Manager responsible for the system	Date and signature of person completing this register

Appendix 4

BOLTON SCHOOL

DATA SUBJECT ACCESS FORM



To:	Clerk and Treasurer Bolton School Chorley New Road Bolton BL1 4PA
From:	<i>(Name, Address, Telephone Number, E-mail)</i>

In accordance with the Data Protection Act 1998 and Bolton School CCTV Policy I request to see the images of me recorded by the CCTV system.

My request refers to the following:

Date:	
Time Start:	
Time End:	
Camera (please indicate the area of the School):	
Event/Activity:	
If you are not known to the Clerk & Treasurer, please provide a description of yourself and what you were wearing at the time:	

Signed: _____

Name (Printed): _____