

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) camera system at Bolton School Foundation.

The School has various 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.

In addition the School's third party transport provider, Tyrers, has CCTV on each of the vehicles used to transport pupils. The school can access that CCTV system following Tyrer's own CCTV policy.

This Policy follows Data Protection Act guidelines and will be subject to regular review.

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 2018 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 buildings, 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, 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.

In observing the actions of pupils CCTV will only be used to:

- Monitor spaces that are less supervised by staff (coaches, entrance to toilets)
- Monitor where pupils could not give an account for themselves

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 by the relevant responsible person upon installation or moving of cameras (See appendix 2).

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.

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.

When circumstances require, the relevant responsible person 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 if required by law. 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 Head of Compliance or the Head of Operational Services who will discuss the request and make a recommendation to the Head of Foundation regarding the application. 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 camera system or application of this policy should be addressed in writing to the Head of Compliance/Head of Operational Services marked "Re:CCTV"

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, specifically relating to CCTV, should be made to the Head of Compliance 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.

Appendix 1

Bolton School CCTV Responsible Persons

Oversees the systems (Responsible for System Reviews)	Head of Compliance / Head of Operational Services (or their nominated deputy)					
CCTV Camera System Locations	School Campus	Arts Centre	Tyrers' and School Vehicles	Nursery	ICT Department	Patterdale Hall
Responsible for Storage & Access to Images	Logistics Coordinator and Senior Sergeant	Events Manager and Leisure Services Manager	Logistics Coordinator and 3 rd party contractor	Nursery Manager	ICT Services Manager	Hall Manager, Residential Manager and Centre Instructor
System Users (Can view images) In addition to all members of the Foundation Leadership Team	Security Officers Sergeants Receptionists Proctors, Pastoral Assistants	Clerk & Treasurer, Assistant Events Manager, Events Operations Manager, Services Manager	Clerk & Treasurer, Proctors, Pastoral Assistants	Deputy Nursery Manager Team Leaders Administrators Receptionist	ICT Infrastructure Manager, Other ICT Staff	

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 4

BOLTON SCHOOL

DATA SUBJECT ACCESS FORM



To:	Head of Compliance/Head of Operational Services Bolton School Chorley New Road Bolton BL1 4PA
From:	<i>(Name, Address, Telephone Number, E-mail)</i>

In accordance with the Data Protection Act 2018 and Bolton School CCTV Policy I request to see the images of me recorded by the CCTV camera 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 School , please provide a description of yourself and what you were wearing at the time:	

Signed: _____

Name (Printed): _____