



# RAINHILL HIGH SCHOOL

CCTV





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HIGH SCHOOL**

**CCTV**

<b>STATUS</b>	<b>NON-STATUTORY</b>
<b>RESPONSIBLE COMMITTEE</b>	BOARD OF TRUSTEES
<b>APPROVAL DATE</b>	14/07/21
<b>RENEWAL DATE</b>	14/07/24



SCHOOLS IN PARTNERSHIP  
**STEPHENSON**  
MULTI ACADEMY TRUST

*Please note, to avoid any confusion, any reference to Rainhill High School in this document also refers to Stephenson MAT and vice versa.*

### **CCTV System Policy Statement**

The Governing body is committed to securing the safety and wellbeing of employees, pupils and others affected by activities on school premises.

Primary Aim

- ✓ To provide a safe & secure environment for staff and pupils.

Additional Aims

- ✓ To provide improved site security.
- ✓ To prevent petty vandalism.
- ✓ To prevent anti-social behaviour in blind spots situated around the school.
- ✓ To monitor pupils behaviour.

### **1.0 Introduction**

- 1.1 The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Rainhill High School hereafter referred to as 'the school'.
- 1.2 The system comprises a number of fixed and dome cameras located around the school site. None of the cameras have the ability to record sound. All cameras are monitored at break and lunchtimes by the IT Department. Access to monitoring the system is also available to all members of SLT, IT Manager, Site Staff and Community Use Officer at any time throughout the day.
- 1.3 This Policy follows Data Protection Act 2018 and ICO CCTV Codes of Practice guidelines.
- 1.4 The Policy will be subject to review, every three years, by the Trustees Finance, Audit and Risk Committee, unless legislative changes necessitate an earlier review.
- 1.5 The CCTV system is owned by the school.

### **2.0 Objectives of the CCTV System**

- 2.1
  - (a) To protect pupils and staff by providing a safer environment.
  - (b) To protect the school buildings and their assets.
  - (c) To increase personal safety and reduce the fear of crime.
  - (d) To support the Police in a bid to deter and detect crime.
  - (e) To assist in identifying, apprehending and prosecuting offenders.
  - (f) To protect members of the public and private property.
- 2.2 The system will not be used in relation to the quality of learning and teaching or in relation to performance management. Equally it will not be used in relation to the quality of work or in relation to annual reviews of support staff.

### **3.0 Statement of Intent**

- 3.1 The CCTV System is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and complies with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.
- 3.2 The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.
- 3.3 Cameras will be used to monitor activities within the school and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school, together with its visitors. The positions and areas monitored are detailed in appendix 1.
- 3.4 The static cameras will not focus on private homes, gardens and other areas of private

property.

- 3.5 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Data will never be released to the media or any other person for purposes of entertainment.
- 3.6 The planning and design has endeavored 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.
- 3.7 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 school CCTV. The warning signs will be checked on a regular basis and any warning sign destroyed or damaged will be replaced. Warning signs are the responsibility of the Site Manager.

#### **4.0 Operation of the System**

- 4.1 The Scheme will be administered and managed by the Chief Operating Officer, in accordance with the principles and objectives expressed in this policy.
- 4.2 The day-to-day management will be the responsibility of the Marketing & Reprographics and IT Team during the week, and the Site Team out of hours and at weekends.
- 4.3 The CCTV system will only be accessible to view to SLT, Year Team staff, Site Staff, Network Manager, IT technicians, marketing and Reprographics department staff who operate CCTV, the Community Use Officer and the DPO.
- 4.4 The CCTV system will only be accessible to review and record to marketing and reprographics department staff who operate CCTV, Chief Operating Officer, Headteacher, Network Manager and Deputy Headteachers responsible for Behaviour and Safeguarding.
- 4.5 The Headteacher or Chief Operating Officer may give permission, on a case by case basis, to other individuals to view and/or review CCTV. This will be logged by the marketing and reprographics department who are responsible for operating the system.
- 4.6 The CCTV system will be operated 24 hours each day, every day of the year. However it is only actively monitored at break and lunchtimes. The utilisation of CCTV system at break and lunchtimes has been included within the schools risk assessment. Additional active monitoring may take place by members of the senior team in response to incident requiring investigation. Recorded information will be examined following specific incidents.

#### **5.0 Liaison**

- 5.1 Liaison meetings may be held with all bodies involved in technical support of the system.

#### **6.0 Monitoring procedures**

- 6.1 Camera surveillance may be maintained at all times.
- 6.2. All CCTV information is continuously recorded and saved to a server which is securely located in the IT Network Office.

#### **7.0 Database Procedures**

- 7.1 All recorded images are stored securely onto a server and can be accessed for up to 14 days, with the present capture rate and the present cameras and server. Access is restricted, initially, to SLT under the leadership of the Chief Operating Officer. The Headteacher or Chief Operating Officer can give consent, in line with this policy, for others to have access.
- 7.2 Data Storage will conform to the requirements of the Data Protection Act. The process for disclosing data about individuals is transparent and available for the scrutiny by representatives of school staff in certain circumstances.
- 7.3 In the event of an incident, recorded images may be viewed by authorised school staff or the Police for the prevention and detection of Crime.
- 7.4 A record will be maintained of the release of any images to the Police or other authorised individuals. A register will be available for this purpose from the Marketing and Reprographics Team.
- 7.5 Any viewing of any recorded images by the Police must be recorded in writing and in the logbook. Requests by the Police can only be actioned under section 29 of the Data Protection Act 2018.

- 7.6 Any recorded images will only be released to the Police on the clear understanding that the images remain the property of the school, and that any such information contained are to be treated in accordance with this code. The school also retains the right to refuse permission for the Police to pass to any other person the images or any part of the information contained thereon unless within a legal proceedings framework such as a passing information to the CPS or recognised agent of the court undertaking legal proceedings in which the images are provided as evidence.
- 7.7 The Police may require the school to retain the images for possible use as evidence in the future. Such images will be saved, properly indexed and properly and securely stored until they are needed by the Police.
- 7.8 Applications received from outside bodies, for legal or health and safety reasons only, to view or release any images will be referred to the Compliance Officer and Chief Operating Officer. In these circumstances images will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order.

## **8.0 Breaches of the Code (Including Breaches of Security)**

- 8.1 Any breach of the Code of Practice by school staff will be initially investigated by the Data Protection Officer and Chief Operating Officer and/or Headteacher, in order for him/her to take the appropriate disciplinary action. Any breach of the Code of Practice by the Chief Operating Officer and/or Headteacher will be initially investigated by the Chair of Trustees.
- 8.2 Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

## **9.0 Assessment of the Scheme and Code of Practice**

- 9.1 Performance monitoring to check the quality of the system, including random operating checks, may be carried out by the Compliance Officer, IT Manager, Academy Business Manager or Chief Operating Officer.

## **10.0 Complaints**

- 10.1 Any complaints about the school's CCTV system should be addressed to the school in line with the School's Complaints Policy.
- 10.2 Complaints will be investigated in accordance with Section 8 of this Code.

## **11.0 Access by the Data Subject**

- 11.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.
- 11.2 Subject Access Requests should be made to the Compliance Officer.

## **12.0 Public Information**

- 12.1 Copies of this Code of Practice will be available to the public from the School Office and can be viewed on the school website.

## **13.0 Legal Requirements**

- 13.1 The use of CCTV at Rainhill High School is registered with the Information Commissioner in compliance with the Data Protection Act 2018.
- 13.2 The Site Manager will ensure that warning signs are put up, one at each entrance, stating that CCTV is in operation.

#### **14. Summary of Key Points**

- This Policy will be reviewed every three years, by the Trustee Finance, Audit and Risk Committee.
- The CCTV system is owned and operated by the school.
- The CCTV system will not be viewed directly out of school operating hours (including community use).
- The CCTV system is not accessible to visitors except by prior arrangement and good reason, and the permission of the Chief Operating Officer and/or Headteacher.
- Any recorded images retained will be properly indexed, stored and deleted after appropriate use.
- Images may only be viewed by persons listed in this policy and those authorised by the Headteacher or Chief Operating Office, which those operating the CCTV system have a record of.
- Images will not be used to inform judgments on the quality of learning and teaching.
- Images required as evidence will be properly recorded, witnessed and packaged before copies are released to the police.
- Images will not be made available to the media for commercial or entertainment.
- The school will comply with the requirements set out in Data Protection Act when implementing this policy.
- Any breaches of this code will be investigated by the Chief Operating Officer / Headteacher or the Chair of Trustees. An independent investigation will be carried out for serious breaches.
- Breaches of the code and remedies will be reported to the Compliance Officer, Headteacher and/or Chief Operating Officer.

#### **15. Protocol**

##### **15.1 Situation as of July 2021**

- CCTV Cameras are operational in the following areas \_
  - A Block - 13 cameras
  - B Block - 5 cameras
  - C Block - 7 cameras
  - E Block & PE - 10 cameras
  - S Block - 11 cameras
  - Mike Doyle - 2 cameras
  - SEN Hub - 3 cameras
  - Library - 2 cameras
  - Dining Areas - 2 cameras
  - Communal Areas of Student Toilets - 2 cameras
  - External Use - 36 cameras
- CCTV Cameras are audio disabled and will continue to be so.
- At present the CCTV is actively monitored for approximately 2 hours per day – at break and lunch time. The designated person for monitoring CCTV is Phill Cheetham, however other members of the Marketing and Reprographics Team, or wider support staff, may undertake the role if required. When active monitoring is in place, key messages are communicated via two way radio to duty staff.
- All cameras are recording. The images from this are kept on the server for 14 days.