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13b. CCTV Policy

Date adopted: September 2024

Next review: September 2026

See EOTAS policy control document (held by the Business Manager) for status, notes and actions about this policy



CCTV Policy

Version	Status	Date	Title of Reviewer	Purpose/Outcome
1.0	adopted	September 2024	School Business Manager	Adoption of CCTV Policy



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Introduction

School uses Close Circuit Television (“CCTV”) within the premises of the school. The purpose of this policy is to set out the position of the school as to the management, operation, and use of the CCTV at the School.

This policy applies to all members of our workforce, visitors to the school premises and all other persons whose images may be captured by the CCTV system.

This policy takes account of all applicable legislation and guidance, including:

- General Data Protection Regulation (“GDPR”)
- Data Protection Act 2018 (together the Data Protection Legislation)
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998

This policy sets out the position of the school in relation to its use of CCTV.

The Data Protection Officer is Mr Evan James EOTAS, Fernbrook Centre, Ferndale Road, Swindon SN2 1HL Email address: dpo@eotas.swindon.sch.uk
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Purpose of CCTV

- safeguard staff and children
- allow for the accurate recording and reporting of positive handling incidents
- assist with the identification, apprehension and prosecution of offenders
- assist with the identification of actions that might result in disciplinary proceedings against staff and students
- reassure parents of correct positive handling procedures in school
- assist with the strategy meetings called by the local authority.
- to provide live feeds to reception to monitor external doors and gate access to be able to see is requesting access and decide if the doors and/or gates should be opened.

Covert recording

There is no covert recording in the EOTAS Centres. All staff members are aware of the need for CCTV in the school.



Cameras

The Centres make every effort to position cameras so that they offer the greatest coverage of indoor spaces to offer the best safeguarding protection for staff and children.

No cameras will focus on external areas not controlled by EOTAS.

The Campus will clearly display signs so that staff, students and visitors are aware they are entering an area covered by CCTV.

Signs will state:

- Which Company is responsible for the maintenance of the cameras and that the Centre is responsible for the CCTV scheme
- the purpose(s) of the scheme
- whom to contact regarding the scheme.

Images

Images produced by the equipment must be as clear as possible so that they are effective for the purpose(s) for which they are intended.

The following standards must be adhered to:

1. After installation, make an initial check of the equipment to ensure it works properly.
2. Ensure an annual inspection maintenance programme.



Retention

Images and recording logs will be held in accordance with the Borough Council/Local Authority policy and associated schedules.

For digital recording systems, CCTV images held on the hard drive of a PC or server will not be overwritten and will be held in line with record keeping procedures for all children within the borough. Images may be stored on removable media such as CDs and will be labelled and stored with records in secured storage. All digital recordings will be digitally watermarked to maintain integrity.

Where the location of the camera and time/date are recorded, these should be accurate.

Document the system for ensuring accuracy- as part of the asset management log

Site the cameras so they will capture images relevant to the purpose(s) for which the scheme has been established.

Ensure all staff and visitors are aware that at the Centre it is always necessary to carry out constant real-time recording.

Cameras should be properly maintained and serviced.

Protect cameras from vandalism so that they are kept in working order.

If cameras break down or are damaged, there should be clear responsibility for getting them repaired and working within a specific time period.

Access to and disclosure of images to third parties

Access to, and disclosure of, images recorded on CCTV will be restricted and carefully controlled by the Head Teacher, the Head of Centre, the SBC Child protection adviser and the Local Authority Designated Officer. The latter 2 will have the authority to show the footage to a third party in the event of a strategy meeting being called. This will ensure that the rights of individuals are retained, and also ensure that the images can be used as evidence if required. Images can only be disclosed in accordance with the purposes for which they were originally collected as detailed at the outset of this policy.

This document separates access and disclosure into two subsections.



Access

Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available unless it meets the criteria of the purpose of the policy as described in section 2 of this policy.

Monitors displaying images from areas in school are located in office spaces. There are no cameras located on the campus where there would be an expectation of privacy.

Viewing of recorded images can only take in the office spaces and is actively encouraged to ensure accurate recording of bound book incidents and to develop practice of positive handling techniques.

If media on which images are recorded are removed for viewing purposes, this should be documented.

Images retained for evidence should be securely stored.

Document the following information when media are removed for viewing:

Date and time they were removed

The name of the person removing the media

The name(s) of the person(s) viewing the images.

The reason for viewing the images

The date and time the media were returned to the system or secure storage.

Disclosures

Disclosures to third parties will only be made in accordance with the purpose(s) for which the system is used (see section 2) and will be limited to:

- police and other law enforcement agencies, where the images recorded could assist in a specific criminal enquiry
- parents who make an allegation against the school
- relevant legal representatives – including officers of the local authority (CP adviser, LADO, union representatives)
- people whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings)



- in exceptional cases, to others to assist in identification of a victim, witness or perpetrator in relation to a criminal incident
- members of staff and or governors involved with Campus disciplinary processes.

***The Head teacher, or his/her designated agent, is the only person who can authorise disclosure of information to the police or other law enforcement agencies.**

All requests for disclosure should be documented. If disclosure is denied, the reason should also be recorded.

In addition to the information required in section above, the following should be documented:

1. If the images are being removed from the CCTV system or secure storage to another area, the location to which they are being transferred.
2. Any crime incident number, if applicable.
3. The signature of the person to whom the images have been transferred.

Individuals' access rights

The Data Protection Act 2018 gives individuals the right to access personal information about themselves, including CCTV images.

All requests for access to images by individuals (when they are asking for access to images of themselves) should be made to the operational head teacher.

Under the Freedom of Information Act 2000, a copy of this policy will be provided to anyone making a written request for it.

Requests for access to CCTV images must include:

- the date and time when the images were recorded
- the location of the CCTV camera
- further information to identify the individual, if necessary

EOTAS will respond promptly, and within the statutory time limits set, of receiving the request and sufficient information to identify the images requested.

If the Centre cannot comply with the request, the reasons must be documented. The requester will be advised of these in writing, where possible.



If there is any doubt about what information must be provided to enquirers, please contact the Information Access Officer (SBC).

Complaints

Complaints and enquiries about the operation of the CCTV systems should be addressed to the Head Teacher.

Enquiries relating to the Data Protection Act should be addressed to the Head Teacher.

If a complainant or enquirer is not satisfied with the response received, they should write to the Chair of the EOTAS Management Committee.

Monitoring Compliance

Heads of relevant areas will undertake occasional reviews with the Information Access Officer (SBC) to ensure updating of knowledge and compliance with this policy and relevant legislation.

