



St Ann's School CCTV (Closed Circuit Television) Policy

St Ann's is proud to be a Unicef Gold Rights Respecting School and as such we actively promote the United Nations Convention on the Rights of the Child and 'live' these rights on a daily basis. Article 3 Best Interests of the Child, Article 16, Protection of Privacy and Article 17 Access to Information are particularly pertinent to this policy.

- **Introduction**

1. St Ann's CCTV system was initially installed by Delta Synergistics. The school has an annually renewed maintenance contract with Delta Synergistics.
2. As part of the Telstar new build project, summer 2020, Amthal installed six additional CCTV cameras, three inside the Telstar building and three outside. From 2021 this maintenance contract has been assigned to Delta Synergistics.
3. The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at St. Ann's School, hereafter referred to as 'the school'.
4. The original system comprises a total of 9 fixed cameras which are located at the pedestrian entrance, car park, school field, inside Orion/Neptune classrooms and inside and outside the Telstar classrooms. All cameras are monitored from a Central Control point in the school office and are only available to selected senior staff.
5. This policy follows Data Protection Act guidelines.
6. The policy will be subject to review biannually.
7. The CCTV system is owned by the school.

- **Purpose of this Policy**

The purpose of this Policy is to regulate the management, operation and use of the CCTV system at the school. The CCTV system used by the school comprises of:

LOCATION	SOUND	RECORDING CAPACITY	SWIVEL / FIXED
Pedestrian main entrance outer gate (visitors)	No	Yes	Fixed
Pedestrian second (inner) gate(visitors)	No	Yes	Fixed
Car park gate	No	Yes	Fixed
Staff room portacabins, outside	No	Yes	Fixed
Two cameras to entrance of new Telstar building	No	Yes	Fixed
Three cameras inside Telstar building , main teaching hall, life skills, Wet Room, wellbeing room, AV room and friendship corner	No	Yes	Fixed
Double classroom (street side of West Building)	No	Yes	Fixed
Field area far side of new Telstar provision	No	Yes	Fixed

- **Objectives of the CCTV system**

1. To protect students and staff in the school against harm to their person and / or property.
2. To protect the school buildings and assets.
3. To deter potential criminal offenders.
4. To increase personal safety and reduce the fear of crime.
5. To assist in identifying, apprehending and prosecuting offenders.
6. To protect members of the public and private property.
7. To assist in managing the school safely and effectively.
8. To support the school in promoting positive behaviour management.

- **Statement of Intent**

1. The CCTV scheme will be 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 Code of Practice. The next renewal date has been noted and will be actioned.
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. Cameras will be used to monitor activities within the school and the school grounds to identify criminal activity actually occurring, anticipated or perceived and for the purpose of securing the safety and well-being of the school students and staff, together with its visitors.
4. Static cameras are not to focus on private homes, gardens and other areas of private property.

5. Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Copies of incidents will only be released to the media for use in the investigation of a specific crime and within the written authority of the police. Copies of incidents will never be released to the media for purposes of entertainment.
6. The planning and design has endeavoured to ensure that the CCTV 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.
7. Information signs, as required by the Code of Practice of the Information Commissioner have been placed at various points around the school.

- **Operation and maintenance of the system**

1. The CCTV system will be administered and managed by the Facilities Manager.
2. The day to day management will be the responsibility of the Facilities Manager.
3. The Control Points are located within the main school office suite. All four doors to the office suite are key pad controlled.
4. The Control Points will only be staffed by persons nominated by the School Business Manager.
5. The CCTV system will be operated 24 hours each day, every day of the year.
6. Recordings are retained for a period of two to three weeks. The hard disc is then over-written.
7. The original CCTV system for the school was installed by Delta Synergistic and is maintained by them. The new CCTV system for the Telstar provision was installed by Amthal and is now maintained by Delta.
8. Cameras are focused on the main entrance areas, the field and Orion/Neptune and Telstar Classrooms. Cameras are NOT located in any discrete areas such as toilets and changing areas.

- **Control Points**

1. The Facilities Manager will check and confirm the efficiency of the system daily and, in particular, check that the equipment is properly recording and that cameras are functional.
2. Access to the CCTV Controls will be strictly limited to nominated staff by a passcode entry on the HDD.

- **Liaison**

1. Liaison meetings may be held with all bodies involved in the support of the system.

- **Monitoring procedures**

1. Camera surveillance can be maintained at all times.

2. There is one monitor point in the School Office.
3. When reviewing any incidents, no one other than personnel authorised by the Head Teacher/School Business Manager/Facilities Manager should be present when viewing CCTV footage.

- **Recording procedures**

1. Any recording required for evidential purposes must be sealed, witnessed, and signed by the Head Teacher, dated and stored in a separate, secure, evidence bag.
2. No one other than authorised personnel should be present when a recording is made, or when an incident is viewed.
3. Recordings may be viewed by the Police for the prevention and detection of crime.
4. A record will be maintained of the release of recordings to the Police or other authorised applicants.
5. Requests by the Police can only be actioned under Section 29 of the Data Protection Act 1998.
6. Should a recording be required as evidence, a copy may be released to the Police under the procedures described in paragraph 9.5. Recording will only be released to the Police on the clear understanding that it remains the property of the school, and both the recording and information contained on it are to be treated in accordance with this policy. The school also retains the right to refuse permission for the Police to pass to any other person the tape or any part of the information contained thereon. On occasions when a Court requires the release of an original recording, this will be provided by the school.
7. The Police may require the school to make and retain recordings for possible use as evidence in the future. Such recordings will be securely stored until they are needed by the Police.

Applications received from outside bodies (e.g. solicitors) to view or release recordings will be referred to the Head Teacher. In these circumstances recordings 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. A fee can be charged in such circumstances. Applications received from outside bodies (e.g. neighbours or parents) to view or release images will be referred to the school's Data Protection Officer and a decision made by a senior leader of the school in consultation with the school's data protection officer (Judicium Education).

- **Training**

- Training will be given to those individuals that have been chosen by the Head Teacher/School Business Manager to monitor and or replay incidents.

- **Breaches of the code (including breaches of security)**

- Any breach of the CCTV policy by school staff will be initially investigated by the School Business Manager, in order for the Head Teacher to take any appropriate disciplinary action.
 - Any serious breach of the CCTV policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.
- **Complaints**
 - Any complaints about the school's CCTV system should be addressed to the Head Teacher.
 - Complaints will be investigated in accordance with Section 10 of this policy.
- **Access by the Data Subject**
 - 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.
 - Requests for Data Subject Access should be made in writing to the Head Teacher.
- **Public Information**
 - Copies of this policy will be available to the public from the school website, the school office and the School Business Manager.
- **Additional Information**
 - In January 2020 St Ann's purchased and installed two fixed Google Nest Cams with audio/video data, one in the small portacabin adjacent to Telstar and one in Galaxy class. These devices retain recordings for a period of 30 days. This was a pilot project prior to the completion of St Ann's new build Telstar facility. Images were password protected and could only be viewed by members of the School Leadership Team and other designated members of staff as appropriate. Google Nest Cams were being trialled to ascertain how well they support health and safety requirements, staff training and pupil progress assessment purposes.
 - As a result of this successful pilot project, six additional Google Nest cameras were purchased and installed in the new Telstar provision from September 2020. These Google Nest Cams are an essential tool in supporting staff in delivering and analysing positive behaviour management programmes with a strong emphasis on students developing a range of self regulation skills.
 - Clips for education purposes can be stored to the schools secure google drive to support the learning of self regulation skills and will be used for behaviour support training and development of PBS plans.
 - St Ann's also has a fixed video camera in the Space Station room in the West Building (calm room) which is continuously switched on whilst the school is in session. This is not part of the CCTV system as there is no facility to record images. This camera is simply used for monitoring purposes by the attendant member of staff, who views the external screen, to ensure student safety at all times. There is

no door to the Space Station and a student can enter or leave at any time. For more information about The Space Station and St Ann's Positive Behaviour Support Policy please refer to St Ann's website.

Reviewed October 2022

Next Review October 2024