HOE VALLEY SCHOOL
CCTV POLICY

Person Responsible: Board of Governors
Date Adopted: March 2019
Date of last review: Autumn 2025
Date of next review: Autumn 2026

INTRODUCTION

The school recognises that CCTV systems can be privacy intrusive.

For this reason, the school has carried out a data protection impact assessment with a view to evaluating whether the CCTV system in place is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the data protection impact assessment has informed the school's use of CCTV and the contents of this policy.

Review of this policy shall be repeated regularly and whenever new equipment is introduced a review will be conducted and a risk assessment put in place. We aim to conduct reviews no later than every two years.

The purpose of this Policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at the school.

1.   OBJECTIVES

The purpose of the CCTV system is to assist the school in reaching these objectives:

- ➢ To protect pupils, staff and visitors against harm to their person and/or property
- ➢ To increase a sense of personal safety and reduce the fear of crime
- ➢ To protect the school buildings and assets
- ➢ To support the police in preventing and detecting crime
- ➢ To assist in identifying, apprehending, and prosecuting offenders
- ➢ To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence
- ➢ To assist in managing the school

2.   CCTV SYSTEM

The CCTV system used by the school are listed in appendix 1

3.   STATEMENT OF INTENT

3.1   Notification has been submitted to the Information Commissioner and the next renewal date has been recorded.

3.2   The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.

3.3   The school will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

3.4   The system has been designed to deny observation on adjacent 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.

3.6   Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design has endeavoured 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 will be clearly visible on the site and make clear who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

3.8   Recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated. In the absence of a compelling need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 30 days.

3.9   CCTV footage is captured in areas defined as 'sensitive' by the ICO. The school is using this footage for safeguarding of those using the facilities

4.   SYSTEM MANAGEMENT

4.1   Access to the CCTV system and data shall be password protected.

4.2   The CCTV system will be administered and managed by Concero support team, who will act as System Manager and take responsibility for restricting access, in accordance

with the principles and objectives expressed in this policy. In the absence of the Systems Manager the system will be managed by the School Business Manager.

4.3   The system and the data collected will only be available to the persons listed in Appendix 2.

4.4   The CCTV system is designed to be in operation for 24 hours each day, every day of the year, though the school does not guarantee that it will be working during these hours. The minibus dashcams (classed as CCTV) operate only when the vehicle is in use. They are positioned with one main camera looking out of the windscreen, and two additional cameras - one capturing footage at the rear of the vehicle, and one facing the interior. They record to an internal SD card in the main camera.

4.5   The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.

4.6   Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by proving clear, usable images.

4.7   Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

         Where a person other than those mentioned in paragraph 4.3 above, requests access to the CCTV data or system, the System Manager must satisfy himself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists access will be refused.

         Details of all visits and visitors will be recorded in a system log book including time/data of access and details of images viewed and the purpose for so doing.

4.8   CCTV footage is captured in areas defined as 'sensitive' by the ICO. The school is using this footage for safeguarding of those using the unisex areas and preventing vandalism of the toilet facilities. There is no visibility on the CCTV system once the cubicle doors are closed as the cubicles are floor to ceiling maintaining individuals heightened expectation of privacy.

5.   DOWNLOADING CAPTURED DATA ONTO OTHER MEDIA

5.1   In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any download media used to record events from the network video recorder must be prepared in accordance with the following procedures: -

   ➢ Each download media must be identified by a unique mark.

   ➢ Before use, each download media must be cleaned of any previous recording.

   ➢ The System Manager will register the date and time of download media insertion, including its reference.

   ➢ Download media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence

store. If a download media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.

➢ The minibus dashcam data is stored in a secure SD card in the main camera. This is only accessible by removing the camera from its position and opening a hatch on the device. The footage will only be reviewed in the case of a reported incident, and operates on a rolling record i.e. new footage writes over the old as the storage fills up.

➢ If download media is archived the reference must be noted.

5.2 Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his replacement and the Headteacher and other authorised senior leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable if possible, for that person to withhold viewing of the data until asked to do so by the police.

5.3 A record will be maintained of the viewing or release of any download media to the police or other authorised applicants. Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the download media (and any images contained thereon) remains the property of the school, and download media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media this will be produced from the secure evidence store, complete in its sealed bag.

5.4 The police may require the school to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until they are needed by the police. Applications received from outside bodies (e.g. solicitors 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.

6. COMPLAINTS

Any complaints in relation to the school's CCTV system should be addressed to the Head Teacher.

7. REQUEST FOR ACCESS FROM THE DATA SUBJECT

The Data Protection Act provides Data Subjects – those whose image has been captured by the CCTV system and can be identified - with a right to data held about themselves, including those obtained by CCTV. Requests for such data should be made to the School Business Manager

8.   PUBLIC INFORMATION

Copies of this policy will be available to the public from the school office.

APPENDIX 1

Location	Camera	Capabilities
Ground Floor (Main school)		
Ground Floor South Stairs	DS-2CD2555FWD-I	Video
Ground Floor East Stairs	DS-2CD2555FWD-I	Video
Ground Floor Food Tech Corridor	DS-2CD2555FWD-I	Video
Ground Floor East Toilets	DS-2CD2555FWD-I	Video
Ground Floor Male Toilet (Sink Areas)	DS-2CD2555FWD-I	Video
Ground Floor Dining queue	DS-2CD2555FWD-I	Video
Under West Stairs	DS-2CD2555FWD-I	Video
Ground Floor West Stairs	DS-2CD2555FWD-I	Video
Ground Floor South Corridor (Looking at west stairs door)	DS-2CD2555FWD-I	Video
Ground Floor Female Toilet (Sink Areas)	DS-2CD2555FWD-I	Video
Warton Hall	DS-2CD6924F-I	180˚ Video
Canteen	DS-2CD6924F-I	180˚ Video
Canteen Servery	DS-2CD2955FWD-IS	Video & Audio‡
Canteen Servery	DS-2CD2955FWD-IS	Video & Audio‡
Worton Hall Servery	DS-2CD2955FWD-IS	Video & Audio‡
Sixth Form area	DS-2CD6924F-IS	Video
Ground Floor south Corridor 2	DS-2CD2542FWD-IS	Video
Reception	DS-2CD2555FWD-IS	Video
Ground Art	DS-2CD2555FWD-IS	Video
Art Corridor	DS-2CD2186G2-ISU	Video & Audio‡
Art Corridor	DS-2CD2186G2-ISU	Video & Audio‡
Ground Floor Dining Hall 1 (Outside SLT Doors)	DS-2CD2186G2-ISU	Video & Audio‡
Canteen	DS-2CD2955FWD-IS	360˚ Video & Audio‡
Canteen	DS-2CD2955FWD-IS	360˚ Video & Audio‡
Canteen	DS-2CD2955FWD-IS	360˚ Video & Audio‡
Reception	DS-2CD2186G2-ISU	Video & Audio‡
Lift Stairwell (Ground floor)	DS-2CD2186G2-ISU	Video & Audio‡
Outside Medical	DS-2CD2186G2-ISU	Video & Audio‡
Food Tech Corridor	DS-2CD2186G2-ISU	Video & Audio‡
Food Tech Corridor	DS-2CD2186G2-ISU	Video & Audio‡
IT Office	DS-2CD4585F-IZH	Video
1st Floor (Main school)		
First Floor South Stairs	DS-2CD2555FWD-I	Video
First Floor East Stairs	DS-2CD2555FWD-I	Video
First Floor East Corridor	DS-2CD2555FWD-I	Video
First Floor East corridor 2	DS-2CD2555FWD-I	Video
First Floor Female Toilet (Sink Areas)	DS-2CD2555FWD-I	Video

‡ Audio recording capabilities on cameras disabled.

Location	Camera	Capabilities
First Floor East Lockers	DS-2CD2555FWD-I	Video
First Floor North Stairs	DS-2CD2555FWD-I	Video
First Floor North Corridor	DS-2CD2555FWD-I	Video
First Floor North Lockers	DS-2CD2555FWD-I	Video
First Floor West Corridor	DS-2CD2555FWD-I	Video
First Floor West Stairs	DS-2CD2555FWD-I	Video
First Floor South Corridor	DS-2CD2555FWD-I	Video
First Floor South Corridor 2	DS-2CD2555FWD-I	Video
Inclusion (1 Camera, 4 Streams)	DS-2PT3326IZ-DE3	Video
Humanities Corridor	DS-2CD2186G2-ISU	Video & Audio‡
Humanities Corridor	DS-2CD2186G2-ISU	Video & Audio‡
Outside staff room	DS-2CD2186G2-ISU	Video & Audio‡
Outside Founders Hall	DS-2CD2186G2-ISU	Video & Audio‡
Outside Founders Hall	DS-2CD2186G2-ISU	Video & Audio‡
Outside music	DS-2CD2955FWD-IS	360˚ Video & Audio‡
Inside Music	DS-2CD2955FWD-IS	360˚ Video & Audio‡
Inclusion Room	DS-2CD2186G2-ISU	Video & Audio‡
Media Room	DS-2CD2955FWD-IS	360˚ Video & Audio‡
Stairs by lift	DS-2CD2186G2-ISU	Video & Audio‡
English Corridor (Doors by english office	DS-2CD2186G2-ISU	Video & Audio‡
English Corridor outside classrooms	DS-2CD2186G2-ISU	Video & Audio‡
English Corridor outside classrooms	DS-2CD2186G2-ISU	Video & Audio‡
2nd Floor (Main school)		
Second Floor East Stairs	DS-2CD2555FWD-I	Video
Second Floor East Corridor	DS-2CD2555FWD-I	Video
Second Floor East Corridor 2	DS-2CD2555FWD-I	Video
Second Floor Female Toilet (Sink Areas)	DS-2CD2555FWD-I	Video
Second Floor North Corridor (Towards 229)	DS-2CD2555FWD-I	Video
Second Floor North Corridor (Towards stairs door)	DS-2CD2555FWD-I	Video
Second Floor North Stairs	DS-2CD2555FWD-I	Video
Second Floor East Lockers	DS-2CD2555FWD-I	Video
Second Floor West Lockers	DS-2CD2555FWD-I	Video
Second floor West Corridoor	DS-2CD2555FWD-I	Video
Second Floor West Stairs	DS-2CD2555FWD-I	Video
Ground Floor Male Toilet (Sink Areas)	DS-2CD2555FWD-I	Video
Second Floor South Corridor	DS-2CD2555FWD-I	Video
Second Floor South Corridor 2	DS-2CD2555FWD-I	Video
Second Floor South Stairs	DS-2CD2555FWD-I	Video
Maths corridor	DS-2CD2186G2-ISU	Video & Audio‡

‡ Audio recording capabilities on cameras disabled.

Location	Camera	Capabilities
Maths corridor	DS-2CD2186G2-ISU	Video & Audio‡
Maths Toilets	DS-2CD2186G2-ISU	Video & Audio‡
Disabled Lift	DS-2CD2186G2-ISU	Video & Audio‡
Science Lockers	DS-2CD2955FWD-I	360˚ Video & Audio‡
Languages (By Double Doors)	DS-2CD2186G2-ISU	Video & Audio‡
Languages (Outside Classrooms)	DS-2CD2186G2-ISU	Video & Audio‡
Languages (Outside Classrooms)	DS-2CD2186G2-ISU	Video & Audio‡
Outside Science rooms by main stairs	DS-2CD2955FWD-IS	360˚ Video & Audio‡
Sixth form block		
First floor (looking at stairwell)	DS-2CD2183G2-IU	Video
Reception	DS-2CD2183G2-IU	Video
Second floor (looking at stairwell)	DS-2CD2183G2-IU	Video
First floor (seminar rooms)	DS-2CD2183G2-IU	Video
Ground floor (towards reception)	DS-2CD2183G2-IU	Video
Study room	DS-2CD63C5G1-IVS	Video
Cafe area	DS-2CD2183G2-IU	Video
Outside		
Front Door	DS-2CD2355FWD-I	Video
Rear Play 1	DS-2CD2355FWD-I	Video
Rear Play 2	DS-2CD2355FWD-I	Video
Rear Play 3	DS-2CD2355FWD-I	Video
Rear Path S	DS-2CD2355FWD-I	Video
Gate 8	DS-2CD2355FWD-I	Video
Rear Woods	DS-2CD2355FWD-I	Video
MUGACam 1	DS-2CD4585F-IZH	Video
Rear Path (MUGAs and 3G pitches)	DS-2CD2643G0-IZS	Video
To Sports	DS-2CD2643G0-IZS	Video
Bike Sheds	DS-2CD2755FWD-IZS	Video
Rear V Gate	DS-2CD2755FWD-IZS	Video
PTZ Rear	DS-2DE4225IW-DE	Video
Kitchen Rear	DS-2CD2755FWD-IZS	Video
Front (Looking at bin shed)	DS-2CD2755FWD-IZS	Video
MUGA cam 2	DS-2CD4585F-IZH	Video
Rear Path North	DS-2CD4585F-IZH	Video
School Rear	DS-2CD4585F-IZH	Video
PTZ Front	DS-2DE4225IW-DE	Video
IT Office	DS-2CD4585F-IZH	Video
Car Park Side	DS-2DE4425IW-DE	Video
Car Park Front	DS-2DE4425IW-DE	Video
Field	DS-2CD2343G0-IU	Video
B MUGA	Video DS-2CD2343G0-IU	Video

‡ Audio recording capabilities on cameras disabled.

Location	Camera	Capabilities
Rear Gate	DS-2DE4425IW-DE	Video
Ground Lift	IPC-T221H	Video
Till 2	DS-2CD1143G0-I	Video
Admin Corridor (SLT)	DS-2CD2955FWD-IS	Video
Media Room	DS-2CD6365G0-IS	Video
Playground under Shelter	DS-2CD6924F-I	Video
Gate 8 – Near	DS-2CD2186G2-ISU	Video
Gate 8 – Far	DS-2CD2186G2-ISU	Video
Back Of Playground	DS-2CD2186G2-ISU	Video
Playground under Shelter	DS-2CD2T45G0P-I	Video
Playground under Shelter	DS-2CD2T45G0P-I	Video
Outside IT Window	DS-2CD2186G2-ISU	Video
Gate 12	DS-2CD2186G2-ISU	Video
Gate 12	DS-2CD2186G2-ISU	Video
Outside Food Tech Stairs (Car Park)	DS-2AE4225TI-D(E)	Video (PTZ)
Walkway between playground and outside sports hall	DS-2CD2186G2-ISU	Video
Fields behind MUGAs (With tables and chairs)	DS-2CD2T45G0P-I	Video
Fields behind MUGAs (With tables and chairs)	DS-2CD2T45G0P-I	Video
Outside Worton Hall (Car Park)	DS-2AE4225TI-D(E)	Video (PTZ)
Minibus #1	VIOFO A139 3CH Triple Dash Cam	Video & Audio‡
Minibus #2	VIOFO A139 3 CH Triple Dash Cam	Video & Audio‡

‡ Audio recording capabilities on cameras disabled.

APPENDIX 2

The following job roles have access to CCTV without having to check with the system manager.

1. SLT
2. HOYs
3. Inclusion Staff
4. Concero Support Team (Currently System Manager)