



CCTV Policy

1. INTRODUCTION

Eagle House School (Sutton) is an independent day school, which provides an appropriate education for secondary-aged pupils who hold a Statement of Special Educational Needs or Education, Health & Care plan for an autism spectrum disorder and associated social and communication difficulties. This will include children and young people with moderate or severe learning difficulties, autism associated behaviours and mental health issues.

The purpose of this Policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at Eagle House School (Sutton) and at the school's post 16 department at Strawberry Lodge, Strawberry Lane, Carshalton, SM5 2NQ.

The school system comprises:

CCTV device type	Qty	Product Type
Type 1 VR dome camera	50	HikVision 4Mp IP dome camera with IR Model No DS-2CD2542FWD-IS
Type 2 VR External dome camera with IR	8	HikVision 2Mp IP dome camera with IR Model No DS-2CD2142FWD-I
Type 3 External bullet camera	1	HikVision 2Mp IP dome camera with IR Model No SD-2CD4A26FWD-IZS
Type 4 External Vari focal VR dome camera	5	HikVision 3MP Varifocal VR Dome camera
Monitor	1	HikVision 21.5" monitor Model No NEON-HD215A
64 Channel 16TB Network Video Recorder	1	HIK Vision

The Post 16 system at The Post 16 provision at Strawberry Lodge, Carshalton comprises:

CCTV device type	Qty	Product Type
Type 1 – 3MP External Low Light Bullet Camera	3	2.8mm lens providing a 98° viewing angle. The camera is true Day/Night operation and has built in infra-red lighting up to a distance of 50 metres.
Type 2 Camera - External Low Light Bullet Camera	2	Day/Night operation and has built in infra-red lighting up to a distance of 50 metres. Behaviour analysis including line crossing, intrusion detection, motion detection. Built in microphone.
Type 3 camera - internal/external vandal resistant dome camera	3	2.8mm – 12mm Vari focal motorised lens with built in infra-red illumination for night vision up to 30 metres. Behaviour analysis including line crossing, intrusion detection, motion detection. Built in microphone.

Type 4 camera - mini dome camera	14	Built in microphone and infra-red lighting 3mp resolution lens. Behaviour analytics, infra-red up to 10 metres, Day/Night operation.
Control Equipment	1 NVR +1 Monitor	The cameras will record to a 62 channel networked video recorder (NVR). The NVR will have 16Tb of surveillance grade hard drive storage allowing for 60 days minimum recordings. All camera images will be recorded at a frame rate of 15 frames per second minimum, at 2048 x 1536 resolutions. Images will be recorded on the following schedule: Monday to Friday 08:00 – 16:00 continuous recording with audio Monday to Friday 16:01- 07:59 motion recording only Weekends Motion detection only When the storage has been completely filled, old recordings will overwritten with the newest recordings.

Cameras are owned and operated by Eagle House Group and located in and around the school sites.

All cameras are monitored from the Head of Education's office (1st Floor 6th Form block) and external cameras only are monitored by the Site Maintenance Officer with images available to selected senior staff only.

The school's Systems Manager is Carrie Haslett (Head of Operations).

This Policy follows Data Protection Act guidelines.

The School Policy will be subject to review annually to include consultation as appropriate with interested parties.

2. OBJECTIVES OF THE CCTV SYSTEM AT EAGLE HOUSE SCHOOL

- To protect pupils, staff and visitors.
- To increase personal safety and wellbeing for pupils, staff and visitors
- To reduce the fear of crime.
- To protect the school buildings and assets.
- Without prejudice, to protect the personal property of pupils, staff and visitors.
- To support the police in preventing and detecting crime.
- To assist in identifying, apprehending and prosecuting offenders.
- To assist in managing the school.

In line with Union recommendations, CCTV footage **will not** be used for performance management purposes. However, on the rare occasion where a formal complaint is made by a 3rd party, it may be used by as part of that investigative process.

3. STATEMENT OF INTENT

The CCTV system seeks to comply with the requirements of the *Data Protection Act* and the Commissioner's Code of Practice (at: <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>).

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

Cameras are used to monitor activities within the school and its grounds to identify criminal activity actually occurring, anticipated, or perceived. It is used for the purpose of securing the safety and wellbeing of the pupils, staff and school together with its visitors. It is intended for 'retrospective' use.

The system has been designed to deny observation on adjacent private homes, gardens and other areas of private property adjacent to the school.

- Materials or knowledge secured as a result of CCTV will not be used for any media or commercial purpose.
- CCTV images will never be released to the media for purposes of entertainment but may be released to police in the investigation of a specific crime with the written authority of the police.

The planning and design has endeavoured to ensure that the system gives 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.

All authorised employees with access to CCTV images are aware of the procedures and restrictions, under the *CCTV Code of Practice*, that need to be followed when accessing and disclosing the recorded images and sound.

4. SIGNAGE

Individuals entering the school site are notified that it is a CCTV protected area and that images are recorded.

Warning signs, as required by the Code of Practice of the Information Commissioner, are clearly visible on the site and displayed on all main school buildings, entry gates and playgrounds.



Signs include information stating that:

- the area is covered by CCTV
- CCTV images are recorded
- the name of the school
- the school contact telephone number for enquiries

5. SYSTEM MANAGEMENT

The system is administered and managed by the Systems Manager, who will act as the Data Controller, in accordance with the principles and objectives expressed in the policy.

The day-to-day systems management is the responsibility of the Systems Manager (supported by the Site Maintenance or Site Facilities Officer).

The system and the data collection is only available to the Head of Education and the Head of Operations and Site Maintenance Officer, externally.

The CCTV system will be operated 24 hours each day, every day of the year.

The System Manager will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional. An 'email alert' system is established to elicit an immediate response to system issues and camera concealment or failure.

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*.

The System Manager must satisfy themselves of the identity of any person wishing to view images or access the system and the legitimacy of the request in collaboration with either the Head of Education. . Where any doubt exists, access will be refused and the CEO contacted.

Details of **ALL** visits and visitors is recorded in the CCTV access log book including time/data of access and details of images viewed (see Section 7).

6. LIAISON MEETINGS

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

7. ACCESS TO AND DISCLOSURE OF CCTV SYSTEM

Within school, access to CCTV images are restricted to those employees authorised to view them, this being: the Head of Education, the Head of Operations (internally/externally) and Site Maintenance or Site Facilities Officer (externally).

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any CCTV images used to record events from the hard drive must be prepared in accordance with the following procedures:

- Requests for permission to access CCTV images should be made in writing to the or CEO.
- Before use, CCTV images must be cleaned of any previous recording.
- Full details of those granted access will be logged in the CCTV access log book, including time/date of access, the reason for the access, details of images viewed and the time when access ceased.

Any application received from an outside body (e.g. Solicitors) to access, view or release CCTV recordings will be referred to the CEO. In these circumstances, recordings may be released with satisfactory documentary evidence demonstrating their use in legal proceedings or SARS (Subject Access Request).

- Before use, CCTV images must be cleaned of any previous recording
- All persons having access must be accompanied by either the Head of Education or Head of Operations CCTV images 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 CCTV images are 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.
- Images may be viewed by the police for the prevention and detection of crime authorised the CEO. A record will be maintained of the release of any CCTV images to the police or other authorised applicants.
- Viewing of CCTV images by the police must be recorded in writing.
- Should CCTV 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 CCTV images remain the property of the school, and are to be treated in accordance with Data Protection legislation.

- The school reserves the right to refuse access to CCTV footage, where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

8. STORAGE AND RETENTION OF CCTV IMAGES

Recorded data will not be retained for longer than is necessary.

While retained the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

Police may request the school to retain recordings for possible use as evidence in the future

All retained data will be stored securely and must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store.

9. BREACHES OF THE CODE OF PRACTICE (including breaches of security)

Any breaches of the Code of Practice by school staff will be initially investigated by the Head of Education or Systems Manager in order for them to take the appropriate disciplinary action.

Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations as to how to remedy the breach

10. COMPLAINTS

Any complaints and enquiries about the operation of the CCTV system within the school should be directed to the Systems Manager in the first instance. Complaints will be investigated by the Head of Education.

11. RELATED POLICIES AND DOCUMENTATION

- ❖ Visitors Policy
- ❖ Data Protection Policy
- ❖ Confidentiality Policy

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Eagle House Group



The CCTV system at Eagle house School, Sutton and the images produced by it are controlled by the System & Data Manager who is responsible for how the system is used and for notifying the Information Commissioner (ICO) about the CCTV system and its purpose (which is a legal requirement of the *Data Protection Act*)

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded. (annually)			
There is a named individual who is responsible for the operation of the system. (System Manager) Name of Individual			
There is a named individual responsible for CCTV data (Data Controlling Officer) Name of Individual			
A privacy impact assessment has been completed			
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.			
Staff and members of the school community will be consulted about the proposal to install CCTV equipment.			
Cameras have been sited so that they provide clear images.			
Cameras have been positioned to avoid capturing the images of persons not visiting the premises and to ensure privacy for neighbouring properties as far as is possible.			
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).			
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.			
The 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.			
Except for law enforcement bodies, images will not be provided to third parties without satisfactory documentary evidence showing they are required for legal purposes			
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the data controller knows to seek advice from the Information Commissioner as soon as such a request is made.			
Regular checks are carried out to ensure that the system is working properly and produces high quality images.			