



# CCTV Policy

## (Inclusive of Body Worn Devices)

<b>Approved On/By:</b>	Finance Budget meeting 24 <sup>th</sup> April 2024
<b>Last Reviewed On:</b>	14 <sup>th</sup> March 2024
<b>Next Review Due By:</b>	Finance, Staffing & Premises Summer Term 2025
<b>Monitoring &amp; Review:</b>	Annually
<b>Staff Member(S) Responsible:</b>	ICT Manager – D Abbas



## 1 Policy Statement

- 1 Hodge Hill College uses Close Circuit Television (“CCTV”) within the premises of the School, and we also use Body Worn Devices on the School perimeter. The purpose of this policy is to set out the position of the School as to the management, operation and use of the CCTV and Body Worn Devices at the School.
- 2 This policy applies to all members of our Workforce, visitors to Hodge Hill College premises and all other persons whose images may be captured by the CCTV system and the Body Worn Devices.
- 3 This policy takes account of all applicable legislation and guidance, including:
  - i. General Data Protection Regulation (“GDPR”)
  - ii. [Data Protection Act 2018] (together the Data Protection Legislation)
  - iii. CCTV Code of Practice produced by the Information Commissioner
  - iv. Human Rights Act 1998

This policy sets out the position of Hodge Hill College in relation to its use of CCTV.

### 1. Purpose of CCTV

Hodge Hill College uses CCTV for the following purposes:

- To provide a safe and secure environment for pupils, staff and visitors
- To manage entry and exit to the site and buildings
- To manage the behaviour of students and investigate any incidents that occur
- To prevent the loss of or damage to the school buildings and/or assets
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

### 2. Description of the system

- a. We have 244 CCTV Cameras located internally and externally in both East and West Buildings. The camera in the reception lobby records audio the remaining cameras only record video. In addition, and 3 PTZ cameras which are moveable and only record image

### 3. Siting of Cameras

- a. All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.
- b. Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The School will make all reasonable efforts to ensure that areas outside of the Hodge Hill College premises are not recorded.
- c. Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.
- d. We will not place cameras in areas where people have a reasonable expectation of privacy, such as changing rooms or toilets, unless there is a clear and valid reason to do so. The reasons may include the management of student behaviour, providing a safe and secure environment, or preventing loss or damage to the buildings or assets. If there is a strong argument for placing cameras in such areas, they will be angled away from toilet cubicles, and clear signage will be displayed to warn people of the use of CCTV.

#### **4. Privacy Impact Assessment**

- a. Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by Hodge Hill College to ensure that the proposed installation is compliant with legislation and ICO guidance.
- b. Hodge Hill College will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

#### **5. Management and Access**

- a. The CCTV system will be managed by Dawud Abbas, ICT Operations Manager.
- b. On a day-to-day basis the CCTV system will be operated by Team ICTS,
- c. The viewing of live CCTV images will be restricted to Team ICTS, Team BSS, Team Sport Facilities, HHE, SFA, SBU and Team West Office.
- d. Any request for playback/downloaded footage of a Pupil incident will need to be submitted to Team ICTS. This downloaded footage will be then saved securely on the Pastoral CCTV drive for Team Pastoral/Leadership to view and investigate. The details of the request and access will be logged onto the CCTV register, which Team ICTS can keep a record of.
- e. Any CCTV requests for Staff incidents will need to be submitted to HHE/SBU. Team ICTS will then be instructed to obtain any CCTV Footage if needed. This footage is then placed onto the relevant H drives of the users mentioned above, which are also logged on the CCTV register.

- f. No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images. **Except authorised bodies, who have filled out the WA170 form.**
- g. The CCTV system is checked daily by Team ICTS to ensure that it is operating effectively.

## **6. Storage and Retention of Images**

- a. Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded. Hodge Hill College retain the recorded footage on the NVR's for approximately 3 months,
- b. The recorded footage is stored for a period of 3/4 months on each NVR. Any downloaded CCTV footage from the NVR and saved to the Pastoral or Leadership CCTV drive will be stored for 12 months only. Unless there is a specific purpose, for which they are retained for a longer period. i.e. an ongoing investigation up to the point the investigation is concluded.
- c. Hodge Hill College will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:
  - i. CCTV recording systems being located in restricted access areas;
  - ii. The CCTV system being password protected;
  - iii. Restriction of the ability to make copies to specified members of staff
- d. A log of downloaded access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by Team ICTS.

## **7. Disclosure of Images to Data Subjects**

- a. Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.
- b. Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the Hodge Hill College Subject Access Request Policy.
- c. When such a request is made the ICT Operations Manager will review the CCTV footage, in respect of relevant time periods and specific location where appropriate, in accordance with the request.
- d. If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The ICT Operations

Manager must take appropriate measures to ensure that the footage is restricted in this way.

- e. If the footage contains images of other individuals then Hodge Hill College must consider whether:
  - i. The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
  - ii. The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
  - iii. If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
- f. A record must be kept, and held securely, of all disclosures which sets out:
  - i. When the request was made;
  - ii. The process followed by Team ICTS, Team Pastoral in determining whether the images contained third parties;
  - iii. The considerations as to whether to allow access to those images;
  - iv. The individuals that were permitted to view the images and when; and
  - v. Whether a copy of the images was provided, and if so to whom, when and in what format.

8. *[Please note that when a subject access request is made then, unless an exemption applies (such as in relation to third party data that it would be unreasonable to disclose) then the requester is entitled to a copy in a permanent form. We have referred only to "access" as opposed to a "permanent copy" as Hodge Hill College may consider it preferable in certain circumstances to seek to allow access to images by viewing in the first instance without providing copies of images. If an individual agrees to viewing the images only then a permanent copy does not need to be provided. However if a permanent copy is requested then this should be provided unless to do so is not possible or would involve disproportionate effort.]*

#### **9. Disclosure of Images to Third Parties**

- a. Hodge Hill College will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.
- b. CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

- c. If a request is received from a law enforcement agency for disclosure of CCTV images then the Data Protection officer must follow the same process as above in relation to subject access requests and a WA170 form must be completed before any CCTV recording is released. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.
- d. The information above must be recorded in relation to any disclosure.
- e. If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

#### **10. Review of Policy and CCTV System**

- a. This policy will be reviewed annually.
- b. The CCTV system and the privacy impact assessment relating to it will be reviewed annually.

[The privacy impact assessment (PIA) relating to the system should be reviewed regularly to ensure that the use of any CCTV system continues to be justified and is compliant with legal requirements. Hodge Hill College should ensure that it has procedures in place to ensure that the CCTV system is regularly reviewed.]

#### **11. Misuse of CCTV systems**

- a. The misuse of CCTV system could constitute a criminal offence.
- b. Any member of staff who breaches this policy may be subject to disciplinary action.

#### **12. Complaints relating to this policy**

- a. Any complaints relating to this policy or to the CCTV system operated by Hodge Hill College should be made in accordance with the Hodge Hill College Complaints Policy.

#### **13. Body Worn Devices**

Body Worn Devices are worn by individuals during the start/end of School. The Body Worn Devices are used to protect and promote a safe, secure environment for Pupils Staff and members of the public during the following times:

- 8.30am - 8.45am Monday - Friday
- 3.45pm - 4.00pm Monday
- 2.30pm - 3.00pm Tuesday - Thursday
- 1.30pm - 2.00pm - Friday

These devices provide an accurate form of evidence in the detection of crime or any other incident. This CCTV policy dictates all the required information to both the CCTV System and the use of BWD.

#### 14. CCTV PRIVACY IMPACT ASSESSMENT TEMPLATE

1. Who will be captured on CCTV?

Pupils, Staff, Visitors (Governors, Contractor and Parents)

2. What personal data will be processed?

Images of visitors, pupils, parents, staff, visitors and contractors on site

- To provide a safe and secure environment for pupils, staff and visitors
- To manage entry and exit to the site and buildings
- To manage the behaviour of students and investigate any incidents that occur
- To prevent the loss of or damage to the school buildings and/or assets
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

3. What are the purposes for operating the CCTV system? Set out the problem that Hodge Hill College is seeking to address and why the CCTV is the best solution and the matter cannot be addressed by way of less intrusive means.

4. What is the lawful basis for operating the CCTV system?

Prevent the loss of or damage to the School Buildings or Equipment, Safeguarding of Pupils, Staff and Visitors, and to assess extreme weather impact

5. Who is/are the named person(s) responsible for the operation of the system?

Dawud Abbas, ICT Operations Manager

6. Describe the CCTV system, including:

- a. how this has been chosen to ensure that clear images are produced so that the images can be used for the purpose for which they are obtained;
- b. siting of the cameras and why such locations were chosen;
- c. how cameras have been sited to avoid capturing images which are not necessary for the purposes of the CCTV system;
- d. where signs notifying individuals that CCTV is in operation are located and why those locations were chosen; and
- e. whether the system enables third party data to be redacted, for example via blurring of details of third party individuals.

The system comprises 244 cameras. The cameras do have sound recording capabilities but are all disabled. The digital video recording equipment is HIKVision NVRs supporting live view, storage and playback of all 244 connected cameras.

- a. The cameras have been sited internally and externally to provide coverage
  - a. throughout the site, whilst avoiding, where possible, capturing areas beyond the site boundaries.
- b. Subject to the exceptions noted in b) above, we have avoided siting cameras in classrooms or offices, in order to afford privacy to staff and students. In addition, there are no cameras in changing rooms or toilets, with the exception of the hall pupil toilets, where cameras have been placed to help manage student behaviour and prevent vandalism. Cameras have been angled to ensure there is no image of the toilet cubicles, and signage is displayed warning of the use of CCTV. We have sited external cameras giving consideration to public areas i.e. roads and pavements. Where possible, cameras have been angled away from such areas. Some of our gate cameras do capture images beyond the site boundary but are needed in order to manage entry and exit to the site for safeguarding and security purpose.
- c. Internal cameras are primarily located in lobbies, corridors and stairwells. We have purposefully avoided siting cameras in classrooms and offices, in order to afford privacy to staff and students at work. Exceptions include the ICT rooms, where the cameras are in place to safeguard expensive equipment. CCTV is also located on the 3G pitch and Courts to safeguard pupils, staff and visitors.
- d. Signage is located throughout the site to ensure that pupils, staff and visitors
  - a. are aware of the presence of the cameras.
- e. The system does not allow third-party data to be redacted.



7. Set out the details of any sharing with third parties, including processors

On occasions we may need to pass downloaded recorded footage onto third parties such as the Police or other authorised authorities to investigate the incident.

8. Set out the retention period of any recordings, including why those periods have been chosen

- 3 months for recorded CCTV footage on the Network Video Recorder (NVR)
- 12 months for Downloaded Footage on either the Pastoral/Leadership CCTV Drives

In certain circumstances there may be a lawful reason to keep the footage longer than the specified times.

9. Set out the security measures in place to ensure that recordings are captured and stored securely

The recording of the CCTV footage is stored on Network Video Recorders (NVR). To access the footage the user would need a secure username and password. The downloaded CCTV footage is stored on a shared drive with set permissions and the user would need a secure username and password to access the content.

10. What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?

The CCTV System is in place for a safe and secure environment for all stakeholders. To minimise the risk of a breach the system is protected by the internal Smoothwall Firewall, password protected access portal to save the footage for use by external approved agencies such as the Police and Social Services. The risks that could potentially arise from the transportation of the footage is that the sharing of passwords, unauthorised access and these risks are reduced by the use of the stated devices.

11. What measures are in place to address the risks identified?

- a. Password protected CCTV System
- b. Authorised Personnel only (signed by HT)

12. Have parents and pupils where appropriate been consulted as to the use of the CCTV system? If so, what views were expressed and how have these been accounted for?

Pupils and Parents are informed of the CCTV system in the Privacy Notice

13. When will this privacy impact assessment be reviewed?

i. This PIA will be reviewed annually.

**14. Approval:**

15. This assessment was approved by the Data Protection Officer: DPO Saima Butt

16. Date: 20<sup>th</sup> March 2024