

Approved by: Mrs. Pat Kerton

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Surveillance and CCTV Policy



High Close School

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Statement of Intent

The purpose of this policy is to manage and regulate the use of the surveillance and CCTV systems at the school and ensure that:

- We comply with all data protection legislation, including the Data Protection Act 2018 and the Protection of Freedoms Act 2012.
- The images that are captured are useable for the purposes we require them for.
- We reassure those persons whose images are being captured, that the images are being handled in accordance with data protection legislation.
- Barnardo's is registered with the ICO as an organisation that processes personal data

The school has a surveillance system for the purpose of:

- Supporting safeguarding and child protection
- Prevention and detection of crime
- Promotion of health, safety and welfare of staff, pupils and visitors
- During the Covid-19 pandemic, to identify and track close and proximity contacts of any person who tests positive for Covid-19.

This includes utilising the system as an objective reference when reviewing footage for the purpose of investigation e.g. allegations, injuries, misconduct, negligence.

It will not be used to monitor the day to day performance of staff but it would be used to review staff actions under any of the above circumstances. It will not be used to supervise young people. High Close will be mindful that the use within the residential units, where this is a home environment for the young people, considers rights to privacy. The policy will set out how this is achieved and should be read in conjunction with the risk assessments for the residential units that set out the need for the use of CCTV. Please note that overnight as described below the system is watched live by night monitors.

This policy does not cover the use of digital recordings using Online Platforms. Please see Remote Learning Policy for details.

Linked Policies and documents

This policy operates in conjunction with the following school policies

- 01. Countering Bullying
- 02. Child Protection and Safeguarding
- 04. Staff Disciplinary Grievance and Whistle blowing
- 09. Health and Safety
- A 05. Missing Persons
- A 06. Privacy Policy
- A 07. Exclusions Policy
- A 08. Staff Code of Conduct
- A 16. Local Safety Rules
- Residential Risk Assessments

Using the Cameras and Monitoring of Data

The school has extensive Closed Circuit Television (CCTV) which operates 24 hours a day in the common areas of the residential units, within school buildings and around the school campus. Most internal cameras have audio capability. This is turned on if deemed necessary in the review of an incident as most antecedents to an event are verbal (auditory) rather than physical (visual).

Visual display monitors for external cameras are located in the main office.

Full access to the surveillance system, software and data will be strictly limited to authorised operators who have individual, password protected, logins on specific computer which have the specific CCTV software installed on. Although the system using the network infrastructure to carry data, the system is stand alone and is not part of the school networked systems.

The school's authorised CCTV system operators are:

- SLT
- Night monitors
- Unit managers
- Primary Lead
- Primary Pastoral Lead
- Catering and Domestic manager

Visual display monitors are available in each residential unit which may be used only in emergency situations when needed for monitoring but should be switched off at all other times.

The footage is used to review incidents (Safeguarding, Behaviour, Health and Safety) when necessary, to ascertain what happened, to clarify events, review to prevent a re-occurrence and therefore ensure all persons are kept safe. The review also enables a unique experience as a learning and development tool for all staff.

The residential units are monitored on a live feed overnight. Visual display monitors with audio capability are used for residential unit communal areas by the night monitors. External cameras are on display in the night monitors office and are switched on at night to ensure the night monitors can complete their roles. Concerns and/or incidents are communicated to the duty staff immediately.

- CCTV may be used in the case of allegations against staff or concerns about conduct to clarify events and ensure the correct actions are taken.
- CCTV may be used in the case of allegations against young people to clarify events and to ensure the correct actions are taken by the relevant authorities.
- CCTV footage may be used to ascertain whether any criminal activities have occurred and may be used for the purpose of investigation and as evidence.

The CCTV viewing form is completed by a system operator each time CCTV footage is viewed. An audit of the CCTV access will be carried out by a member of SLT on a half termly basis.

Privacy by Design

Effective Signage will be in place at the entrance to the site and in Key locations around the site making all pupils, staff and visitors aware of the use of CCTV.

All young people, parents/carers and placing authorities/professionals will be made aware of the CCTV policy in their admissions meeting at the school and will be asked for their consent prior to beginning their placement at the school.

All visitors to the school are made aware that the school use CCTV and an explanation of why and how this footage is used will be displayed on arrival when they sign in.

CCTV cameras are only placed where they do not intrude on anyone's privacy and are necessary to fulfil their purpose

CCTV cameras in residential units have been placed to ensure as much privacy as possible for residential pupils, it is in communal areas and corridors and not within bedrooms or living areas.

The school will make every effort to position cameras so that their coverage is restricted to the school premises, both indoor and outdoor areas.

The school will ensure that the surveillance and CCTV system is used to create a safer environment for staff, pupils and visitors to the school, and to ensure that its operation is consistent with the obligations outlined in data protection legislation.

Footage is held for approx. 31 days before being automatically deleted. Sections can be saved for longer if needed for evidence in an investigation. Any saved footage will be deleted once it is no longer needed.

A Data Protection Impact Assessment has been written and approved.

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act 2018.

All requests should be made in writing to the Principal. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

The school will respond to requests within 30 calendar days of receiving the written request.

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

For full policy regarding SAR please refer to the High Close Privacy Policy

All Subject Access Requests will be logged with One Trust, in line with Barnardo's recommendations.

Access to and Disclosure of Images to Third Parties

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators)

Requests should be made in writing to the Principal.

The data may be used within the school's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Principal in the first instance. If the matter is not resolved then Barnardo's Complaints and Whistleblowing Policies should be followed.

Monitor and Review

This policy will be monitored and reviewed on an annual basis by SLT.

The Principal and SLT will be responsible for monitoring any changes to legislation that may affect this policy and make the appropriate changes accordingly.

The Principal will communicate changes to this policy to all members of staff.