

# Harlington Upper School



## CCTV Procedure

**Policy Number: HUS005**

**Edition 2: July 2017**

**Approved By: Governing Body (1)**

Document Control		
Edition	Issued	Changes from previous
1	01/11/2015	None – new document – Approved by Governing Body
2	03/07/2017	No change – Reviewed internally – minor amendments to reflect change from House to Year pastoral system.

Review frequency: Every 3 years.

Review Date: November 2018

**Bedford Schools PFI**  
**Harlington Upper School**  
**CCTV Procedure**  
**HUS005**

## **1. Introduction**

- a) CCTV policy between Bedford Education Partnership (BEP), Galliford Try Facilities Management (GTFM) Central Bedfordshire Council (CBC) and Harlington Upper School (the School)
- b) The purpose of this procedure is to regulate the management, operation and use of the closed circuit television (CCTV) system at Harlington Upper School, hereafter referred to as 'the School'.
- c) The system comprises of 24 fixed and 1 dome camera located around the external areas of the school building. These are part of the PFI building / asset security system owned by BEP and maintained by GTFM. Additionally the school have installed through variations, 4 internal fixed cameras located strategically around problem toilet areas to deter vandalism and identify offenders.
- d) The CCTV system is maintained by Lyrico Systems on behalf of GTFM who are the Data Controller on behalf of BEP.
- e) All images are only available to the Data Controller or such persons nominated by the School
- f) This Procedure follows Data Protection Act guidelines.

## **2. Objectives of the CCTV scheme**

- a) To provide video monitoring for the security of the building and act as a visual deterrent to potential vandalism and criminal activity.
- b) To support the Police in a bid to deter and detect crime where appropriate
- c) To assist in identifying, apprehending and prosecuting offenders where appropriate

## **3. Statement of Intent**

- 3.1 The CCTV Scheme will be registered with the Information Commissioner's Office (ICO) under the terms of the Data Protection Act 1998, the Data Controller and will seek to comply with the requirements both of the Data Protection Act and the ICO Code of Practice.
- 3.2 BEP, GTFM and the School will treat the system and all related information, documents and recordings as data which is protected by the Act.
- 3.3 The CCTV system will be used to monitor activities within the site to identify criminal or inappropriate activity.
- 3.4 Any viewing of images of Students via the CCTV will be by the School specified staff only, and will be compliant with current Safeguarding Regulations.

- 3.5 Cameras are sited and image capture restricted so as not to view areas that are not of interest and are not intended to be the subject of surveillance, such as private homes, gardens and other areas of private property
- 3.6 Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals.
- 3.7 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will not be released other than to the police for use in the investigation of a specific crime.
- 3.8 The planning and design has endeavoured to ensure that the Scheme 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.
- 3.9 Warning signs will be placed at the main school entrances and at appropriate internal areas, as required by the ICO Code of practice

## **4. Operation of the System**

- 4.1 The system will be administered and managed by GTFM, as Data Controller in accordance with the principles and objectives expressed in the ICO Code of Practice.
- 4.2 The CCTV system will be operational, but not manned 24 hours each day, every day of the year.
- 4.3 GTFM will authorise members of the School staff nominated by the School to view the CCTV system, where appropriate.
- 4.4 The system will automatically overwrite recordings on a loop system every 31 days

## **5. Management of the System**

- 5.1 GTFM will check and confirm the efficiency of the system and in particular that the equipment is properly recording and that cameras are functional.
- 5.2 GTFM will be responsible for maintaining system maintenance logs.

## **6. Liaison**

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

## **7. Monitoring procedures**

- 7.1 CCTV surveillance monitors will be accessible during core hours and out of hours will be as required and via GTFM.
- 7.2. Monitors are installed in the main office to which images will be continuously recorded, but not viewed.
- 7.3 When the system is not operational, the system screens will be turned off to prevent unauthorised viewing.

## **8. Viewing Procedures**

- 8.1 Recording may be viewed by the Police for the prevention and detection of crime
- 8.2 A record will be maintained of the release of recording to the Police A register will be available for this purpose.
- 8.3 Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.

- 8.4 Should the recording be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1, 8.2 and 8.3 of this Code. Recordings will only be released to the Police on the clear understanding that the recording remains the property of the school, and both the recording and information contained on it are to be treated in accordance with this code. The school also retains the right to refuse permission for the Police to pass to any other person the recording or any part of the information contained thereon. On occasions when a Court requires the release of an original recording this will be produced from the secure evidence device store, complete in its sealed bag.
- 8.5 The Police may require on request that the school retain a stored recording for possible use as evidence in the future. Such recordings will be properly indexed and securely stored until they are needed by the Police.
- 8.6 Applications received from outside bodies (e.g. solicitors) to view or release recordings will be referred to the duty holder GTFM and in matters concerning students the Head teacher of the School. In these circumstances the recording 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 may be charged in such circumstances by the School.

## **9. Breaches of the code (including breaches of security)**

- 9.1 Any breach of the Code of Practice by any party will be initially investigated by the appropriate party.

## **10. Complaints**

- 10.1 Any complaint about the school's CCTV system should be addressed to GTFM, as Data Controller. Any issues concerning the school will be forwarded to the Head teacher for reference.

Gallifordtry Facilities Management.

CSCBedfordSchools@gallifordtry.co.uk

Harlington Upper School

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- 10.2 Complaints will be investigated in accordance with this Code.

## **11. Access by the Data Subject**

- 11.1 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.
- 11.2 Requests for Data Subject Access should be made to the Data Controller in accordance with the ICO Code of Practice.

**HARLINGTON UPPER SCHOOL CCTV – List of staff approved to view footage.**

Headteacher  
Deputy Headteacher  
Assistant Headteachers  
Business Manager  
Designated Safeguarding Staff  
Head of Sixth Form  
Assistant Heads of Sixth Form  
Assistant to Head of Sixth Form  
Heads of Year  
Year Support Workers  
Main Office Admin Staff

**GALLIFORD TRY FACILITIES MANAGEMENT – List of staff approved to view footage.**

GTFM Managing Director  
GTFM Operations Director  
GTFM Facilities Manager for HUS  
GTFM Site Services Manager for HUS  
GTFM Site Premises Managers for HUS