Brentford School for Girls

CCTV POLICY

Rev	*Date*	*Description*
5	*June 2025*	*Next review due*
4	June 2023	Reviewed
3	September 2022	Reviewed
2	September 2021	Reviewed
1	February 2021	Initial version.

Introduction

The school has carried out a data protection impact assessment to evaluate that 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 as the school recognises that CCTV systems can be privacy intrusive.

Objectives

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

(a) To protect pupils, staff and visitors against harm to their person and/or property;

(b) To increase a sense of personal safety and reduce the fear of crime;

(c) To protect the school buildings and assets;

(d) To support the police in preventing and detecting crime;

(e) To assist in identifying, apprehending and prosecuting offenders;

(f) To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence;

(g) To assist in managing the school.

Purpose of this policy

The purpose of this Policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at the school. The CCTV system, which includes sound recording, used by the school comprises of:

List of Cameras 2023

Statement of Intent

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

The CCTV system will seek to comply with the requirements of the Data Protection Act, Protection of Freedoms Act 2012 and the most recent Commissioner's Code of Practice.

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

The system has been designed so far as possible to deny observation on adjacent private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

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.

Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible on the site and to the general public, making clear who is responsible for the equipment and how to contact the school.

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

CCTV images must only be accessed during the working day from the main school site during normal school hours, unless in the event of a major emergency with permission from the Executive Headteacher or Head of School.

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 compelling a need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 30 days.

System management

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

The CCTV system will be administered and managed by Chris Lazos - IT Manager who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. Access to the system will also be limited to:
Executive Headteacher
Head of School
Assistant Headteacher in charge of behaviour
IT Technician
Business Manager
Site team
Pastoral Manager
Reception/Admin team

Only the Executive Headteacher/Head of School can alter who has access to the system.

Downloading and saving data collected from the system will only be allowed by the Systems Manager, his replacement, and the following appropriate members of staff:

Executive Headteacher
Head of School
Assistant Headteacher in charge of behaviour
IT Technician
Business Manager

Only the Executive Headteacher/Head of School can alter permissions to download and save footage from the system.

The CCTV system is designed to be in operation 24 hours each day, every day of the year, though the school does not guarantee that it will be working during these hours.

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. The school will ensure that an annual maintenance programme with a CCTV specialist is in place

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

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 above, requests access to the CCTV data or system, the System Manager must refer to either the Executive Headteacher or Head of School, to satisfy themselves of the identity and legitimacy of purpose of any person making such request. Where any doubt exists, access will be refused.

The System Manager will ensure that staff adhere to strict usage controls when accessing CCTV. Any staff member suspected of miss-using the CCTV system will be investigated and staff may face disciplinary action due to misconduct.

Downloading and saving captured data on to the school's network

CCTV images and videos (including sound) saved for the purposes of investigating an incident will be saved into a specified folder on the school network, with access limited to those who are involved in identifying people and/or investigating the incident in question.

Footage will be kept for three months after the conclusion of the investigation

Downloading captured data on to other media

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

(a) Each download media must be identified by a unique mark.

(b) Before use, each download media must be cleaned of any previous recording.

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

(d) 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.

(e) If download media is archived the reference must be noted.

Sharing downloaded data

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, their replacement, the Executive Headteacher, Head of School and authorised staff as agreed by the Executive Headteacher and Head of School. 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.

A record will be maintained (See Appendix A) of the viewing or release of any downloaded data 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 downloaded data remains the property of the school and 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 data to any other person. On occasions when a Court requires the release of a downloaded data this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the school to retain the downloaded data for possible use as evidence in the future. Such downloaded data 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 the Executive Headteacher or Head of School in consultation with the school's Data Protection Officer.

Complaints about the use of CCTV

Any complaints in relation to the school's CCTV system should be addressed to the Executive Headteacher.

Request for access by the data subject

The Data Protection Act provides Data Subjects, those whose image has been captured by the CCTV system and can be identified, a right to data held about themselves, including those obtained by CCTV. Requests for such data should be made to Mr P May Asst. Headteacher or Mrs M Baldy, Business Manager, Brentford School for Girls, 5 Boston Manor Road, Brentford, TW8 0PG.

Public information

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

Linked policies

Data Protection Policy

Staff Disciplinary Policy

Appendix A

CCTV Data Access – Log

Date	Reason for reviewing CCTV footage from other areas other than main school site/or by other members of staff than those authorised in CCTV Policy – e.g. Police	Footage Accessed by/released to – name of person