




Framingham Earl High School CCTV Policy	
Date Adopted by LGB	Spring 2021
Date to be Reviewed	Spring 2022
Chair of LGB electronic signature Peter Porter	Date 3 rd March 2021
Headteacher electronic signature 	Date 3 rd March 2021

1. Introduction

This Policy supports the Health and Safety and online safety strategy for Framingham Earl High School, the School. It sets out the management responsibilities associated with the provision of CCTV, the viewing of images and recording of information and adheres to the 12 guiding principles of use, taken from the Home Office Surveillance Camera COP June 2013. See APPENDIX A.

2. Provision of CCTV

2.1 All fixed cameras are in plain sight on the campus and are managed directly by School employees.

2.2 The School has 46 CCTV cameras. These are shown, with their position and range, in APPENDIX B.

2.3 The cameras are passive and are therefore not continuously monitored. They are activated by movement. They record to a NAS drive which retains images for up to one week and then overwrites the images.

2.4 The cameras are not located in a manner which allows intrusive viewing of any student changing rooms or toilets.

2.5 Some cameras are within teaching areas (ICT suites)

2.6 There is one camera in the School Reception and 5 cameras at the front of the School.

2.7 Signage is displayed at the entrance to the School alerting visitors to the presence of CCTV cameras. All new employees are informed of the presence of CCTV during the Health and Safety induction.

2.8 None of the cameras overlook areas or buildings not on the School site.

3. Objectives of the CCTV System

- 3.1 To protect students, employees, volunteers, visitors and members of the public about their personal safety.
- 3.2 To protect the School buildings and equipment and the personal property of students, staff, volunteers, visitors and members of the public.
- 3.3 To support the police and community in preventing and detecting crime and assist in the identification and apprehension of offenders.
- 3.4 To monitor the security and integrity of the School site and deliveries and arrivals.
- 3.5 To monitor and uphold discipline among students in line with the Student Code of Conduct.
- 3.6 To support safeguarding.

4 Responsibilities

4.1 The Local Governing Body

The Governing Body has overall responsibility for approving the CCTV Policy, but delegates this to the Compliance and Audit Committee.

The Compliance and Audit Committee also has overall responsibility for monitoring the implementation of this policy.

4.2 The Headteacher holds overall responsibility for the provision and use of the CCTV system. This includes:

- Annual review of this Policy and the Privacy Impact Statement (APPENDIX C).
- Review of the provision of CCTV in the event of significant changes to the buildings or activities undertaken at the School.
- Approving those employees who have access to the online monitoring of the system.
- Approving the release of recordings to persons (see 6).

4.3 The ICT Technician and 3rd party (Intouch systems) are responsible for:

- The technical and functional management of the system.

- The maintenance of an efficient system which meets the needs of the School.
- Arrangements for routine inspection, repair or alteration of the system.

4.4 **The Premises Manager** is responsible for:

- The inclusion of CCTV as a control measure within the Security and Access risk assessment.
- The review of arrangements as part of any accident, near miss or serious incident investigation.

4.5 **Staff** authorised to monitor the system are responsible for-

- Ensuring the CCTV system is not used for personal reasons or gain.
- The system is only to be used to identify the location, actions or behaviour of persons or vehicles as part of an investigation into an accident, near miss or reported event which may be of a security, safety or disciplinary nature.
- CCTV footage is not released to other individuals without the approval of either the Headteacher or Deputy Headteacher. Where the footage may be of use to more than one party, such as in the event of a vehicle accident, this must be made available to both or all parties.
- Ensuring a completed CCTV Footage Access Request Form (APPENDIX D) has been received before providing images to a person (see 6.4).
- Identifying and reporting any defects or weaknesses in the system to the Headteacher.

5. **Authorised Users**

5.1 Access is limited to the following-

- The Headteacher
- Members of the Leadership Team
- Directors of Learning and their Deputies
- Premises Manager

5.2 Access is limited by the provision of the necessary software to those at 5.1. Any request to become an authorised user must be approved by the Headteacher.

6. **Requests for Images**

6.1 A request to view CCTV footage or images by other staff or a third party must be approved by either the Headteacher or the Deputy Headteacher.

6.2 All individuals have the right to access personal data the School holds of them, including information held on the CCTV system. Should an individual want to view CCTV footage of themselves, the CCTV Footage Access Request Form at APPENDIX D must be submitted to the Headteacher. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

6.3 The Headteacher must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request.

6.4 Circumstances may arise when CCTV images may be released to a third party who is not part of Framingham Earl High School or the data subject (or their legal representative).

Examples of this are:

- A request or instruction by the Police or some relevant statutory authority.
- To make a report regarding suspected criminal behaviour.
- To the School insurance company where required in order to pursue a claim for damage done to insured property
- To the owner of property, such as a vehicle, if damaged on site
- Any other circumstances required under law or regulation.

6.5 Where images are provided to third parties under 6.4, wherever practicable steps will be taken to obscure images of non-relevant individuals.

6.6 The Authorised User may release images to School staff only without approval, where a delay might contribute to an escalation or worsening of circumstances related to security, safeguarding or safety. As soon as is practicably possible, the Headteacher must be informed

7. Specific Surveillance Equipment

7.1 The School reserves the right to deploy CCTV for surveillance purposes when necessary e.g., to detect crime. In doing so the following principles must be observed-

- The Headteacher must give permission for any deployment of CCTV equipment for surveillance purposes.
- Where equipment is being used for the detection of crime, the Headteacher is to make the Police aware (and seek their advice if necessary) of what the School intends to record.

- Surveillance equipment must not be deployed in toilets or changing rooms. CCTV is deployed in the washbasin area of the boys' toilet.

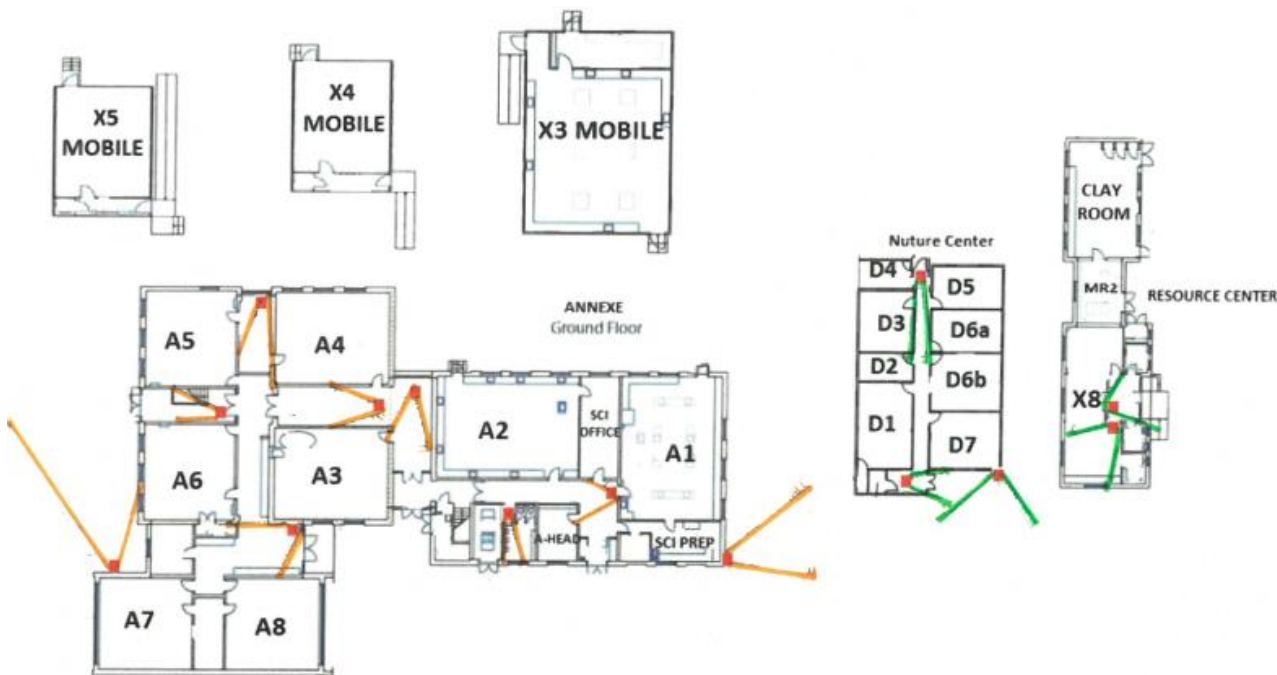
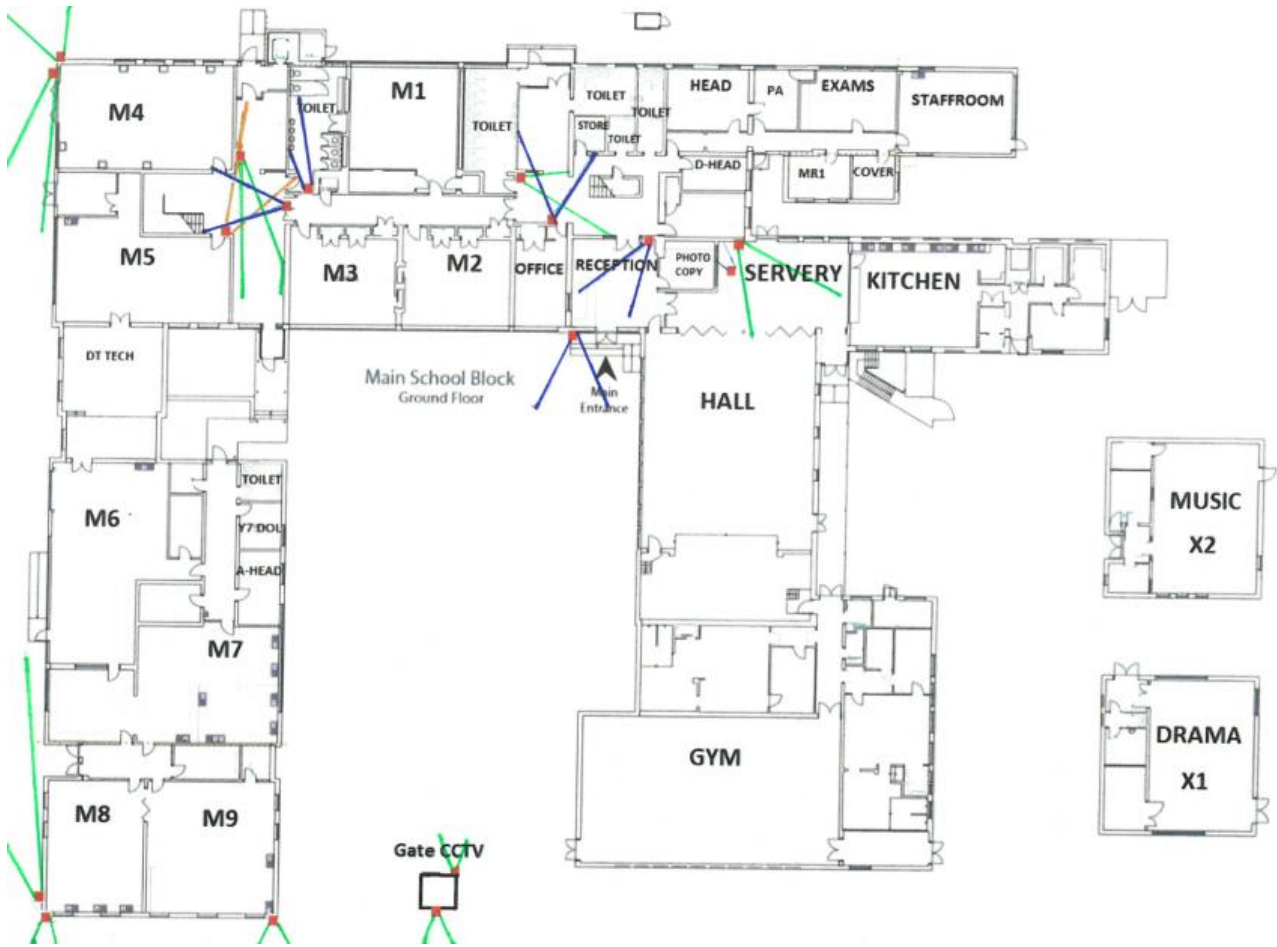
8. **Complaints**

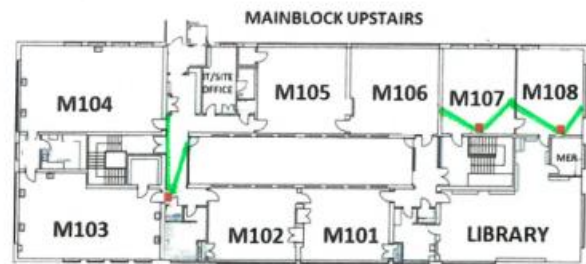
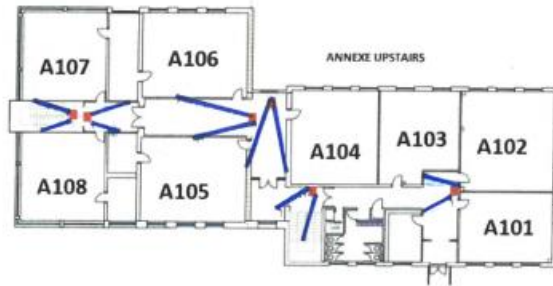
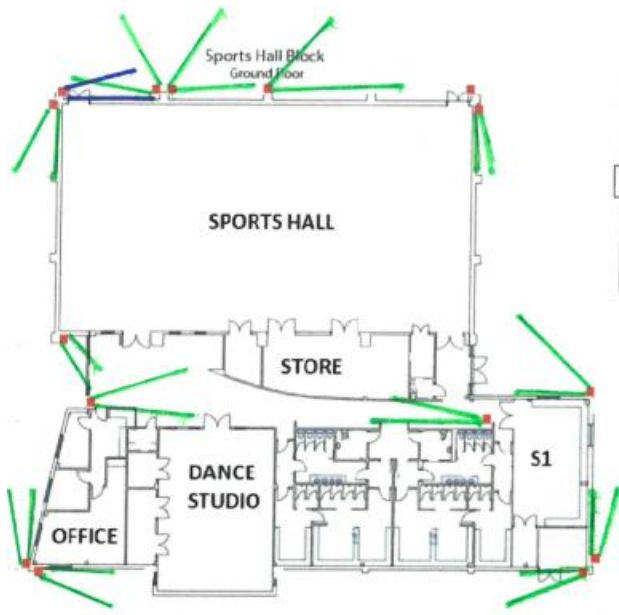
8.1 Any complaint arising from the use of CCTV should be made through the School Complaints procedure. Where a complainant does not want to make a formal complaint, the matter should be referred to the Headteacher for investigation and response.

The 12 guiding principles of use, taken from the Home Office Surveillance Camera COP June 2013 and how they are met within this policy.

PRINCIPLE	RELEVANT SECTIONS
Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.	Section 3
The use of a surveillance camera system must consider its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.	Sections 2 and 4.1
There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints	Sections 2.6, 6 and 8
There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.	Sections 4 and 5
Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.	Sections 3, 4 and 7
No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system and such images and information should be deleted once their purposes have been discharged.	Sections 2.2 and 3
Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.	Sections 3, 4 and 6

Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.	Sections 2 and 5
Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.	Section 5
There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.	Section 4.1
When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.	Section 6.8
Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.	Section 4.2





UPDATED VERSION due March 2021

Framingham Earl High School Privacy Impact Assessment

Risk	Solution	Result	Evaluation
Persons unaware that CCTV is in use	<ul style="list-style-type: none"> • CCTV in use signs are displayed at some entrances to the site and on signs across the site • Cameras are visible and not obscured • New staff are told during the induction training • CCTV policy is available to all staff on sharepoint 	Risk is reduced	Employees, visitors and students can reasonably be expected to have seen the signs or the cameras or for staff to have had this information given to them on commencement of employment. More signs to be displayed at entrances and Reception.
Persons are viewed on CCTV without valid reason	<ul style="list-style-type: none"> • School policy sets out the objectives of the system thereby providing the circumstances in which recorded images may be viewed. • School policy identifies a restricted list of those staff who may monitor CCTV recordings • Safeguarding culture supports employee understanding of appropriate use of CCTV images 	Risk is eliminated	CCTV access is restricted to Authorised Users with clear objectives as to its use.
Security of any retained images is compromised	<ul style="list-style-type: none"> • School policy sets out system management and staff responsibilities • Use of a CCTV images access request form 	Risk is reduced	Access to retained images is restricted to Authorised Users with a log kept of any

	<ul style="list-style-type: none"> • CCTV system overwrites images after approximately 1 week, depending on position. 		images provided to another person.
Recording of inappropriate images	<ul style="list-style-type: none"> • Cameras are not deployed within toilets or changing rooms • Cameras are positioned so that views do not capture toilet or changing room areas 	Risk is eliminated	Framingham Earl High School complies with National Minimum Standards. This requirement influences the position of the cameras and their field of view.
Unauthorised sharing of images	<ul style="list-style-type: none"> • A log is maintained of any video or still images which are captured • School policy sets out system management and staff responsibilities • Safeguarding culture supports staff understanding of the appropriate use of CCTV images 	Risk is reduced	Access to retained images is restricted to Authorised Users with a log kept of any images provided to another person. Approval from senior managers required as set out within the policy.

FRAMINGHAM EARL HIGH SCHOOL

CCTV FOOTAGE ACCESS REQUEST

The following information is required before the School can provide copies of or access to CCTV footage from which a person believes they may be identified.

Please note that CCTV footage may contain the information of others that needs to be protected, and that the system typically over-records footage within a matter of a few days.

Name and address: (proof of ID may be required)	
Description of footage (including a description of yourself, clothing, activity etc.)	
Location of camera	
Date of footage sought	
Approximate time (give a range if necessary)	

Signature*

Print Name.....

Date

- * **Note: If requesting CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 or over, the child's authority or consent must be obtained except in circumstances where that would clearly be inappropriate and the lawful reasons to provide to the parent(s) outweigh the privacy considerations of the child.**