



Surveillance Security Policy

Person Responsible:	Mrs L Wade	Frequency of Review:	1 Year
Authorisation By:	Governors	Notice Date:	30/10/2019
Authorisation Date:	20/11/2018	Review Due By:	30/11/2019

1 Purpose

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Upper Wharfedale School and the Phone Recording Software, in line with General Data Protection Regulation (GDPR) 2018.

2 CCTV

2.1 Introduction

The system comprises a number of dome cameras located around the school site. All cameras are monitored from a Central IT Support Office and are only available to designated staff – members of the ICT Support and Site Teams and members of the Senior Leadership and Management Team.

The CCTV system is owned by Upper Wharfedale School. The Head Teacher is responsible for compliance with the policy.

2.2 Objectives

- To increase personal safety of staff students and visitors and reduce the fear of crime.
- To protect the school buildings and their assets.
- To support the Police in a bid to deter and detect crime.
- To assist in identifying, apprehending and prosecuting offenders.
- To protect members of the public and private property.
- To assist in managing the school.

2.3 Statement of intent

The school will treat the system and all information, documents and recordings obtained and used, as data which is protected by GDPR.

2.4 Camera Locations

There are 4 cameras located in school which are all visual only, no audio is recorded.

- Sports Block Reception
- Reception
- Main classroom corridor
- Hall (does not record only used for live feed backstage during School Performances)

2.5 Operation of the System

Cameras will be used to monitor activities within the school to identify activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school staff, pupils and visitors.

Cameras will be sited so they only capture images for the purposes for which they are installed, and care will be taken to ensure that reasonable privacy expectations are not violated. The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with GDPR.

Cameras will be positioned so they do not capture images of areas that are not of interest and are not intended to be the subject of surveillance such as individuals' private property including gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the police for use in the investigation of a specific crime. Recordings will never be released to the media for purposes of entertainment.

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.

Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the school CCTV, and within the area covered.

The Scheme will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in this policy.

The day-to-day management will be the responsibility of both the Senior Leadership Team (SLT) and the ICT Support Manager during the day and the Site Team out of hours and at weekends.

The Central IT Support Office becomes a CCTV Control Room when the CCTV system is accessed by SLT and the Site Team.

The CCTV system will be operated 24 hours each day, every day of the year.

2.6 Image Storage Procedures

The CCTV footage is stored on the local network and the retention period is up to one month.

If footage is required for evidential purposes, it can be downloaded and kept with other evidential documents. This evidence is then kept for the period of time it is required, before being deleted. At which point it falls under our data back-up retention period.

Footage may be viewed by, and a copy provided to, the Police for the prevention and detection of crime. The Head Teacher will determine whether to make disclosure to the police, after seeking advice from the DPO. A register will be maintained of the release of footage to the Police or other authorised applicants.

Viewing of footage by the Police must be recorded in writing.

Should footage be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1 (iv) of this Code. The Police become the Data Controller of the footage once it is provided to them. On occasions when a Court requires the release of original footage this will be produced from the secure evidence store, complete in its sealed bag.

The Police may require the school to retain the stored footage for possible use as evidence in the future. Such footage will be properly indexed and securely stored until they are needed by the Police.

Disclosure will only take place where there is a legal requirement placed upon the school to do so and, there is legal power upon the school to do so, e.g. in response to a Court Order; in response to a subject access where an individual requests access to footage of themselves. A fee can be charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

2.7 Breaches of the policy (including breaches of security)

Any breach of the Code of Practice by school staff will be initially investigated by the Headteacher, in order for him/her to take the appropriate disciplinary action.

Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

2.8 Assessment of the scheme and code of practice

Performance monitoring, including random operating checks, may be carried out by the ICT Support Manager.

2.9 Complaints

Any complaints about the school's CCTV system should be addressed to the Headteacher.

2.10 Access by the Data Subject

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.

Requests for Data Subject Access should be made to the Headteacher.

2.11 Public information

Copies of this Code of Practice will be available to the public from the School Office and the Headteacher.

3 Call Recording Software

3.1 Introduction

There is a call recording feature on the telephone system which allows members of staff to record a call by pressing a button on their handset, to ensure the health and wellbeing of staff and students. Calls are only recorded if this feature is activated by the user.

3.2 Operation

The following extensions have call recording enabled, and are operated using the button identified in the list:

- Extension 201 – button 11
- Extension 204 – button 8
- Extension 205 – button 8
- Extension 213 – button 8

The call is then stored on the handset as a voicemail. A light will show in the top right hand corner of the handset when the call has been ended.

To access the recording, the user must dial into their voicemail using a password to access the messages.

The call is stored until it is deleted by the user.