

# HOLLAND HOUSE SCHOOL

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## CCTV Policy

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### **Review Arrangements:**

Date	January 2020
Review Date	January 2021

## Amendments

Amendment	Date	Description
Annual review	January 2020 HST	Change to section 2 paragraph 2 as CCTV now on specific machines

## 1. MISSION STATEMENT

Holland House is an academic selective school that provides a high-quality learning environment which aims to provide an opportunity for every child to reach their potential. We recognise each child to be unique with individual needs and talents. We cater for pupils' social, emotional, moral and spiritual wellbeing in a stimulating and creative academic environment. Pupils are well prepared for their next school and for their future lives in a fast moving and challenging globalised world.

## 2. Introduction

This is the School's approved policy relating to the use of CCTV. Holland House School uses closed circuit television (CCTV) images to monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, to prevent loss or damage to the school property and reduce crime. The system comprises 7 fixed cameras. The system does not have sound recording capability. The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.

The CCTV can be monitored on the computers of the Site Manager, the Bursar and the Headmistress, as required. The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and the school community.

The school's CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act (DPA). The use of CCTV, and the associated images and any sounds recordings is covered by the DPA. This policy outlines the school's use of CCTV and how it complies with the legislation.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All Operators are trained about their responsibilities under the CCTV policy. All Employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

### 3. STATEMENT OF INTENT

The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use. The Code of Practice is published at:

<https://ico.org.uk/media/for---organisations/documents/1542/cctv---code---of---practice.pdf>

CCTV warning signs will be clearly and prominently placed at all external entrances to the school. Signs will contain details of the purpose for using CCTV (see Appendix A). In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area. The planning and design have 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.

### 4. SITING THE CAMERAS

Cameras will be sited so they only capture images relevant to the purposes for which they are installed, (as described above), 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 the legislation. The school will make every effort to position cameras so that their coverage is restricted to the school premises, which will include outdoor areas.

CCTV will not be used in classrooms but may be placed in areas within school that have been identified by staff and pupils as not being easily monitored.

Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

### 5. COVERT MONITORING

The School may in exceptional circumstances set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording. In these circumstances' authorisation must be obtained from a member of the senior leadership team. Covert monitoring must cease following completion of an investigation. Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles.

### 6. STORAGE AND RETENTION OF CCTV IMAGES

The School retains CCTV images for 4 weeks. The school stores CCTV images on the hard drive of the CCTV system

## **7. ACCESS TO CCTV IMAGES**

Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available

## **8. SUBJECT ACCESS REQUESTS (SAR)**

Individuals have the right to request access to CCTV footage relating to themselves under the GDPR.

All requests should be made in writing to the School Bursar. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example, date, time and location. The school will respond to requests within 1 calendar month of receiving the 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 on-going investigation.

Please see the Subject Access Request policy for further details.

## **9. 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).

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.

## **10. COMPLAINTS**

Complaints will be dealt with in accordance with the school's Complaints Procedure.

## **11. APPENDIX A: CCTV SIGNAGE**

It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled. The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded.

- The purpose of using CCTV.
- The name of the school.
- The contact telephone number or address for enquiries.

