



Pontypridd High School

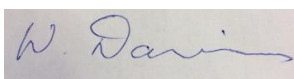
CCTV Monitoring Policy

'Learning and achieving together'
'Dysgu a chyflawni gyda'n gilydd'

CCTV Monitoring Policy

Date of policy:	March, 2023
Adopted:	Premises Committee Meeting, 21 st March 2023
To be reviewed:	Spring 2026
Member of staff responsible:	Headteacher
Committee Responsible:	Premises and Health and Safety

Signed :  Headteacher

Signed :  Chairperson of the Governing Body

Date : March 29th, 2023

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1. Purpose of this policy

The Purpose of this policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television).

CCTV systems are installed in premises for the purpose of enhancing security of the building(s), open areas and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and / or in the external environment of the premises during both the daylight and night hours each day.

CCTV surveillance at our school is intended for the purposes of:

- protecting the school site, our buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, students and visitors
- to monitor and uphold our school rules and expectations are respected in line with our positive relationships policy and approach to rewards and sanctions.
- preventing bullying;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the police in a bid to deter and detect crime; and
- assisting in identifying, apprehending and prosecuting offenders

CCTV will not be used to monitor members of staff carrying out their routine duties of employment.

The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team. The CCTV system has been upgraded over the last 5 years through RCT approved contractors, Brecongate and COMTEC. The system is now managed and maintained by the IT support team in the school.

The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff, governors and members of our school community.

The school's CCTV is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2016/679.

The Data Controller is the : Network Manager

Authorised operators : Network Manager, Headteacher and other members of the Senior Leadership Team, Senior Safeguarding Officer.

The Responsible Officer is : Headteacher (Deputy Headteacher in absence)

All authorised operators / employees with access to images are aware of the procedures that need to be followed when accessing the recorded images.

All operators are made aware of their responsibilities in following the CCTV Code of Practice.

All employees are aware of the restrictions in relation to access to, and disclosure of recorded images.

Any employees that have authority to view CCTV footage have signed a confidentiality agreement as per Appendix 1 which is logged with the Data Controller.

2. Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. 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.

CCTV warning signs are clearly and prominently placed in strategic points around the school site, both within and outside school buildings. (See Appendix 2)

Signs at the school entrance will contain the contact name of the data controller for the CCTV system.

In areas where CCTV is used, the School will ensure that there are prominent signs placed 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 guaranteed that the system will cover or detect every single incident taking place in the areas of coverage.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies and related legislation. Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy. Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the School or a student attending our School. All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by our School.

CCTV monitoring will never be used in any observing or monitoring a member of staff's performance.

Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulation and Data Protection Act 2018.

3. Location of cameras

The cameras are sited so that they only capture images relevant to the purposes for which they have been 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 the images captured comply with the legislation. The school will make every effort to position the cameras so that their coverage is restricted to the school premises, which includes both indoor and outdoor areas.

CCTV will be used in some classrooms containing significant capital equipment e.g. computer rooms, and in limited areas within the school where staff and learners may spend time on a 1-1 basis for safeguarding purposes for both learners and staff.

Members of staff have access to site maps which show the details of where CCTV cameras are situated.

CCTV Video Monitoring and Recording of Public Areas may include the following:

- Protection of school buildings and property: The building's perimeter, entrances and exits, reception and corridors, special storage areas, café area, receiving areas for goods/services
- Monitoring of Access Control Systems: Monitor and record restricted access areas at entrances to buildings and other areas
- Verification of Security Alarms: Intrusion alarms, exit door controls, external alarms
- Video Patrol of Public Areas: Parking areas, Main entrance/exit gates, Traffic Control
- Criminal Investigations (carried out by the police): Robbery, burglary and theft surveillance

4. Access to CCTV images

Access to recorded images will be restricted to the staff authorised to view them and will not be made widely available. Supervising the access and maintenance of the CCTV System is the responsibility of the Headteacher. The Headteacher may delegate the administration of the CCTV System to another staff member. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

Images are stored on a password protected hard drive linked to the system, which is based in the main server room. The images are stored on the system for 31 days and are then overwritten by new footage. The CCTV system is NOT linked to any wifi or external servers.

Requests for CCTV footage must be made by a member of the schools Senior Leadership Team (SLT) via e-mail to the Network Manager. This request will be

logged electronically and all further communication regarding the request will be logged to provide a full audit trail. When the exported footage is viewed by SLT they will be required to complete an electronic log stating the purpose of reviewing the footage. The date and time that the footage is viewed will be logged automatically for audit purposes.

5. Subject access requests (SAR)

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the GDPR.

All requests should be made in writing to the Data Protection Officer. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location.

The applicant may view the CCTV footage if available.

The school will respond to requests within 30 days 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.

6. Access and disclosure of images to third parties

There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police supported by an official request for the recorded data.

If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However, very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

Requests for images should be made in writing to the Data Protection Officer.

7. Responsibilities

The Headteacher will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the School.
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy.

- Ensure that the CCTV monitoring is consistent with the highest standards and protections.
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.
- Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system.
- Ensure that monitoring recorded tapes are not duplicated for release.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally.
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the School and be mindful that no such infringement is likely to take place.
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy”
- Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 31 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil).
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.
- Ensure that camera control is not infringing an individual’s reasonable expectation of privacy in public areas.

CCTV has the potential to be privacy intrusive. The School will perform a Data Protection Impact Assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and address a pressing need identified.

- Recorded images and information will be subject to appropriate security measures to safeguard against unauthorised access and use.

8. Policy monitoring and review

The Data Protection Officer is responsible for monitoring and reviewing this policy.

Regular monitoring and reporting will take place through reports to the Leadership Team and Governing Body Premises / Health and safety Committee who in turn report to the full governing body.

This policy will be reviewed in the summer of 2024 in line with the planned changes that lead to our school becoming a new, 3-16 school from September, 2024.

However, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

Appendix 1 : Pontypridd High School confidentiality agreement



Pontypridd High School Confidentiality Agreement

Welcome to Pontypridd High School.

Please read and sign the Confidentiality agreement below.

During the period of your time with us you will very likely have access to confidential information about learners via CCTV operations in order to investigate incidents and provide safeguarding functions to both learners and staff.

It is a requirement of your viewing of any CCTV footage that you do not disclose this information to any third party unless authorised to do so by the Responsible Officer (Headteacher), or are required to do so under any statute, enactment or court direction.

This restriction will continue to apply after viewing any CCTV footage without limitation in time but shall cease to apply to any information or knowledge that subsequently comes into the public domain, other than as a result of unauthorised disclosure by you.

Your name (print)	
Your signature	
Today's date	

Yours sincerely,

Huw Cripps

Headteacher

Appendix 2 : PHS school site CCTV information and signage



STRONG HERITAGE | STRONG FUTURE
RHONDDA CYNON TAF
TREFTADAETH GADARN | DYFODOL SICR



CAMERÂU AR WAITH CCTV IN OPERATION

I ddibenion atal troseddu a diogelu'r gymuned
For the purpose of Crime Prevention and Community Safety

CYDLYNYDD Y SYSTEM SYSTEM OPERATOR

Ffon / Telephone : 01443-486133
E-boost / Email : contact@pontypriddhighschool.co.uk

Appendix 3 : Pontypridd High School – site map

