



# FARNEY CLOSE SCHOOL

## CCTV POLICY and Code of Practice

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<b>Signed</b>	
<b>Role</b>	<b>Governor</b>
<b>Date Approved</b>	

## **Why does the school consider that the use of CCTV is reasonable?**

This Policy and Code of Practice has been produced in accordance with the Data Protection legislation and associated guidance. It sets out the responsibilities of school's senior managers where Closed-Circuit Television (CCTV) systems are in operation and gives details of how these systems should be managed. The Policy and Code of Practice applies to all CCTV systems being operated by Farney Close School.

Farney Close School acknowledges that its business activities include:

- Work with children and young people who can place themselves at risk
- Work with children and young people (young people) who present a higher level of risk and may need specific CCTV monitoring to keep them and others safe.
- The fact that size of the site means there will be areas that people will venture to and may put themselves at risk which may or may not be covered by CCTV,
- May lead to confrontational situations with members of the public.
- May attract those with nefarious and criminal intent.
- Aim to provide a high-quality provision keeping people safe.

Therefore, it is our policy that CCTV equipment may be used in any public or private area that school young people and employees have access to and / or which are under the control of the school. The purpose for using CCTV in these areas will be to:

- Ensure the safety of young people, employees and others, from acts of violence, intimidation, self-harm or abuse.
- Monitor the security of premises under our control and detect criminal activity.
- Act as a deterrent to those who would otherwise engage in threatening, intimidating, violent, abusive, self-harming or criminal activities.
- Provide evidence where there has been an alleged criminal offence, unreasonable behaviours or breach of company policy / procedure.
- To monitor the flow of people and vehicles on the school site for safety and reasons of security
- For reasons of health and safety and accident prevention.

## **How will the school review the impact of installing CCTV?**

Prior to any new CCTV system being installed, an Impact Assessment must be carried out. The Impact Assessment will be undertaken by the Principal and Designated Safeguarding Officer and any other appropriate person as required.

The Impact Assessment will consider whether the installation of a CCTV system is justified after:

- Identifying the purpose of the system and the benefits it will provide.
- Identifying the scope of the system and the areas it will monitor.
- Identifying any adverse impact, in particular whether the system is unnecessarily intrusive.
- Considering any possible alternatives to monitoring.

## **What are the responsibilities of the Data Control Manager in relation to CCTV?**

The Data Control Manager for the school is the Vice Principal. This person has the legal responsibility for ensuring the system complies with all the relevant legislation. However, the day-to-day operating of CCTV systems outdoors, on site, is the direct responsibility of the Site Manager. Where CCTV is used indoors, the responsibility for this lies with the Principal and Designated Safeguarding Lead, who may devolve day to day responsibility of this to a specific person who works in that locality.

Using the CCTV system for any other reason than those stated as purposes will be viewed as misuse. Deliberate or negligent breaches of this policy, or wilful misuse of a CCTV system will be viewed as Gross Misconduct and may lead to disciplinary action, up to and including summary dismissal.

The Site Manager will ensure that any employee who has specific responsibilities for the operating of a site CCTV system is fully trained in:

- this policy
- the system's use and controls
- the procedure for reporting of faults
- data protection issues

## **Who will install and maintain the school's CCTV systems?**

All CCTV systems will be installed and maintained by competent contractors. These contractors will be selected and managed in accordance with relevant and current legislation and guidance.

Damage or faults to cameras will be reported to the Site Manager immediately on a maintenance request form that should then be handed directly to the Site Manager. The Site Manager will make regular checks on all CCTV equipment to ensure that they are working correctly, and that the system's clock is synchronised with GMT.

It is imperative that the system be regularly maintained to ensure monitored and recorded images are the highest quality. Images should be of such quality and clarity that:

- person recognition is easily achieved
- views of entrances and exits allow vehicle recognition
- general views show surrounding and activities

## **Are there signs to identify that the school uses CCTV?**

There is a sign at the entrance to the school indicating that CCTV is in use.

The sign is clearly visible by all who enter the premises and is a suitable size and positioned at eye level. It is able to be seen by both pedestrians and drivers.

## **How will CCTV images be stored?**

Digital recording equipment must be kept in a locked room at all times. This room should only be accessible to the Site Manager and / or other nominated person(s). At no time should this equipment be accessible to unauthorised persons. Should the equipment

require to be accessed by a service engineer, the room will be unlocked and then locked again, once the necessary work has been completed, by the Manager / nominated person.

No CCTV recording system on this site will retain images for more than 31 days.

### **Does the school use CCTV inside any buildings?**

CCTV is used during sleeping hours to ensure the safety of young people and staff whilst inside the building. This is to ensure that young people and staff are kept safe throughout the night. By night we mean hours that adults sleeping in are asleep. This helps us to reduce the level of risk surrounding the care and supervision that we are unable provide throughout the night. For example, young people getting up at night and going into areas they should not and placing themselves or other at risk; going into other young people' bedrooms, stealing, causing physical assault, possible sexual activity, destruction of property, or absconding. CCTV is not only a deterrent but enable staff to have evidence who has been up at night.

### **Where is CCTV allowed if it is used in buildings?**

CCTV is only placed in each residential provisions main corridor. It will never be placed in bedrooms, changing areas, bathrooms, or toilets. At present (Jan 2022) it is only placed in the corridors on the residential units so the images of those leaving their rooms during the night can be captured on CCTV. It is placed so it cannot see into bedrooms or bathrooms.

### **What factors will the school consider when deciding whether or not to use CCTV in buildings?**

The decision was taken in January 2020 to use CCTV in residential houses corridors to enhance our ability to keep our young people safe at night. Whenever a decision is taken to place CCTV in buildings, the SLT will review the use of each device at the end of each half term for the following half term.

We give serious consideration about the impact on the personal privacy of all of those who may be affected. When undertaking our half termly reviews, we always consider possible alternative means of surveillance rather than using CCTV including the time period of use, and the means of recording, storing and monitoring, as well as making an informed decision as to when to halt the use of CCTV in a particular designated area.

Letters have been sent to all parents / carers of young people living on Houses re CCTV being used. This letter now appears as part of the introduction package for the parents and carers of each new young person. A copy of this letter can be found at the end of this Policy as can a copy of the monitoring form.

### **Who can view CCTV images and gain third party access?**

All monitors that display current images will be kept out of reach to prevent any interference.

Recorded images must only be viewed in a restricted area, away from unauthorised personnel and the public. Access to viewing these images will be granted by the Principal, DSL or Site Manager. The Principal and DSL have responsibility for deciding requests for access by third parties.

Recorded images will only be viewed in line with the listed purposes for having the CCTV system, in which case the school reserve the right to make permanent copies for evidential reasons. Any copies made will be stored in a locked, secure place and only ever shown to those who have a proper reason for viewing.

Whenever recorded images have been viewed, a CCTV Recording Review Form must be completed.

Occasionally, it will be necessary to allow a third party to view recorded images, for example in the event of criminal activity or subsequent to an accident. Typical Third Parties will include:

- The Police
- Multi Agency Safeguarding Hub Officers
- The Health and Safety Executive
- Employee Representatives

Subsequent to a complaint or incident, should the recorded images show a school employee committing an illegal act or breaching Company Policy or Procedure, that record may be used as evidence in any possible subsequent disciplinary action. In these cases, the member of staff concerned and any representative, shall be allowed to view the relevant footage. They may also request a copy of the footage for their own records, however if this is the case the school cannot take any responsibility for the control of that recording. In all cases the CCTV Recording Review Form will be completed.

#### **Can other non-designated people request to view images of themselves on site?**

It is within their rights for members of the public to request to see images of themselves or their property which have been captured by our CCTV. Such requests must be made in writing and a fee of £10 can be levied to cover costs etc.

## Appendices 1

### Letter to parents concerned as referred to above:

Our Ref: SH/CO

xx xxxx xxxx

«Title» «First\_Name\_parentcare» «Last\_Name\_parentcare»  
«Student\_address»  
«Address\_Line\_2»  
«City»  
«Postcode»

Dear «Salutation»

I am writing to inform you that due to an incident which saw two boys on Edward House get up in the night and go into each other's rooms, I have taken the step of activating CCTV in the main corridor areas of the house in order to ensure that all young people are properly safeguarded.

As part of this, a small monitor and recording device will be kept in the sleeping-in room and the whole system will be activated to run between 11pm and 7.30am. Any information recorded will be kept for 24 hours only, following which the next night's recording will overrun the previous recording. I want to absolutely assure you that there will be no cameras in bedrooms, toilets or bathrooms.

Should you wish to discuss this matter further please do not hesitate to contact me.

Yours sincerely

**Principal**

Appendices 2



Farney Close School  
House CCTV Monitoring

Day	Date	Time CCTV checked	Name YPs up during night:	Comment of their activity:	Length of time:
Tues					
Wed					
Thurs					
Fri					