

# Meadows School

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## Surveillance and CCTV Policy

	<b>Contents</b>	<b>Page</b>
1.	Introduction	1
2.	Statement of Intent	2
3.	Using Cameras and Monitoring of Data	2
4.	Privacy by Design	3
5.	Access to CCTV Footage	4
6.	Access to and Disclosure of Images to Third Parties	5
7.	Complaints	5
8.	Monitor and Review	5
9.	Links to Policies and Legislation	6

### 1. Introduction:

Meadows School is committed to Barnardo's Basis and Values, which provides the framework within which we can engage in giving young people a better start in life.

- We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils.
- We endeavour to provide a safe and welcoming environment where children are respected and valued.
- We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.
- We understand that as a Special School we are working with some of the most vulnerable young people in the UK and therefore have a duty to ensure stringent procedures and training must be in place and available to all staff.

The procedures contained in this policy apply to all staff, volunteers and governors.

## 2. Statement of Intent:

The school has a surveillance system for the purpose of:

- Supporting safeguarding and child protection
- Prevention and detection of crime
- Promotion of health, safety and welfare of staff, pupils and visitors

This includes utilising the system as an objective reference when reviewing footage for the purpose of investigation e.g. allegations, injuries, misconduct, negligence.

**It will not be used to monitor the performance of staff or to supervise young people.**

The CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The system complies with the requirements of the Data Protection Act 2018 and UK GDPR.

Footage or any information gleaned through the CCTV system will never be used for commercial purposes.

In the unlikely event that the police request that CCTV footage be released to the media, the request will only be complied with when written authority has been provided by the police, and only to assist in the investigation of a specific crime.

The footage generated by the system should be of good enough quality to be of use to the police or the court in identifying suspects.

## 3. Using Cameras & Monitoring Data:

The school has extensive Closed-Circuit Television (CCTV) which operates 24 hours a day in the common areas within school buildings and around the school campus. Most internal cameras have audio capability. This is only turned on if deemed necessary in the review of an incident.

Visual display monitors for external cameras are located in the main office.

Full access to the surveillance system, software and data will be strictly limited to authorised operators and will be password protected. System operators can access the CCTV system through the software on their individual computers when required.

The school's authorised CCTV system operators are:

- Senior Leadership Team
- Head of Key Stage 2

The footage is used to review incidents (Safeguarding, Behaviour, Health and Safety) when necessary, to ascertain what happened, to clarify events, review to prevent a re-occurrence and therefore

ensure all persons are kept safe. The review also enables a unique experience as a learning and development tool for all staff.

CCTV may be used in the case of allegations against staff or concerns about conduct to clarify events and ensure the correct actions are taken.

CCTV may be used in the case of allegations against young people to clarify events and to ensure the correct actions are taken by the relevant authorities.

CCTV footage may be used to ascertain whether any criminal activities have occurred and may be used for the purpose of investigation and as evidence.

The CCTV viewing form is completed by a system operator each time CCTV footage is viewed. An audit of the CCTV access will be carried out by a member of the Senior Leadership Team on a half termly basis.

Cameras will be checked regularly to ensure they are in good working order.

The system will be checked for faults once a term by  
Any faults in the system will be reported as soon as they are detected and repaired as soon as possible, according to the proper procedure.

Footage will be stored securely and encrypted wherever possible. The CCTV footage will be password protected and any camera operation equipment will be securely locked away when not in use.

Proper cyber security measures will be put in place to protect the footage from cyber attacks.

Any software updates (particularly security updates) published by the equipment's manufacturer that need to be applied, will be applied as soon as possible.

#### 4. Privacy by Design:

Effective signage is in place at the entrance to the site and in key locations around the site making all pupils, staff and visitors aware of the use of CCTV.

All young people, parents/carers and placing authorities/professionals will be made aware of the CCTV policy in their admissions meeting at the school and will be asked for their consent prior to beginning their placement at the school.

All visitors to the school are made aware that the school use CCTV and an explanation of why and how this footage is used will be displayed on arrival when they sign in.

The school will make every effort to position cameras so that their coverage is restricted to the school premises, both indoor and outdoor areas.

Footage is held for approx. 31 days before being automatically deleted. Sections can be saved for longer if needed for evidence in an investigation.

## 5. Access to CCTV footage

Access will only be given to authorised persons, for the purpose of pursuing the aims stated in section 1.1, or if there is a lawful reason to access the footage.

Any individuals that access the footage must record their name, the date and time, and the reason for access in the access log.

Any visual display monitors will be positioned so only authorised personnel will be able to see the footage

### 5.2 Staff Access

The following members of staff have authorisation to access the CCTV footage:

- o The Principal: E Reilly
- o The Deputy Head: K Bain
- o The Assistant Head and DSL: W Phillimore
- o The Data Protection officer: L Harlock
- o The Premises Supervisor: S Hawkins
- o Anyone with express permission of the headteacher

CCTV footage will only be accessed from authorised personnel's work devices, or from the visual display monitors.

All members of staff who have access will undergo training to ensure proper handling of the system and footage.

Any member of staff who misuses the surveillance system may be committing a criminal offence and will face disciplinary action.

### 5.2 Subject Access Requests (SAR)

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

All requests should be made in writing to the Principal. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location. The school will respond to requests within 30 calendar days of receiving the written 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.

Images that may identify other individuals need to be obscured to prevent unwarranted identification. The school will attempt to conceal their identities by blurring out their faces, or redacting parts of the footage. If this is not possible the school will seek

their consent before releasing the footage. If consent is not forthcoming the still images may be released instead.

The school reserves the right to charge a reasonable fee to cover the administrative costs of complying with an SAR that is repetitive, unfounded or excessive.

Footage that is disclosed in a SAR will be disclosed securely to ensure only the intended recipient has access to it.

Records will be kept that show the date of the disclosure, details of who was provided with the information (the name of the person and the organisation they represent), and why they required it.

Individuals wishing to make an SAR can find more information about their rights, the process of making a request, and what to do if they are dissatisfied with the response to the request on the [ICO website](#)

**6. Access to & 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.

Requests should be made in writing to the Principal.

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.

**7. Complaints:**

Complaints and enquiries about the operation of CCTV within the school should be directed to the Principal in the first instance. If the matter is not resolved, then Barnardo's Complaints and Whistleblowing Policies should be followed.

**8. Monitor & Review:**

This policy will be monitored and reviewed on an annual basis by The Head of Safeguarding. The Principal and SLT will be responsible for monitoring any changes to legislation that may affect this policy and make the appropriate changes accordingly.

The Principal will communicate changes to this policy to all members of staff.

## 9. Links to other policies and Legislation

### Policies

[Meadows School Data Protection Policy](#)

[Meadows School Safeguarding Policy](#)

[Meadows School Service Recording Protocol](#)

[Barnardo's Safeguarding Policy](#)

[Barnardo's Complaints Procedure](#)

### Legislation

- o [UK General Data Protection Regulation](#)
- o [Data Protection Act 2018](#)
- o [Human Rights Act 1998](#)
- o [European Convention on Human Rights](#)
- o [The Regulation of Investigatory Powers Act 2000](#)
- o [The Protection of Freedoms Act 2012](#)
- o [The Freedom of Information Act 2000](#)
- o [The Education \(Pupil Information\) \(England\) Regulations 2005 \(as amended in 2016\)](#)
- o [The Freedom of Information and Data Protection \(Appropriate Limit and Fees\) Regulations 2004](#)
- o [The School Standards and Framework Act 1998](#)
- o [The Children Act 1989](#)
- o [The Children Act 2004](#)
- o [The Equality Act 2010](#)