PRESTON MUSLIM GIRLS
HIGH SCHOOL
Education with Patience Modesty Gratitude Humility Sincerity

CCTV Policy

Approved by:	Headteacher
Last reviewed on:	November 2022
Next review due by:	November 2023

Document control

Owner	Governors		
Date effective from	11th November 2022	Date of next review	10th November 2024
Review period	2 years	Version	Draft

Summary of changes in this version

Information
1st Draft

Contents

Scope and purpose

1. PMGHS take our responsibility towards the safety and security of staff, visitors and pupils very seriously and use Closed-Circuit Television Systems (CCTV) as a deterrent to aggressive behaviour and damage to our establishment.
2. This policy covers the use of CCTV systems which capture moving and still images of people who could be identified to observe what an individual is doing and to prevent a crime.
3. PMGHS has a CCTV system in place in all of its sites. Images are monitored and should be used in strict accordance with this policy.
4. The purpose of this policy is to regulate the management, operation and use of CCTV systems within PMGHS and ensure that we comply with data protection requirements.
5. To support this policy staff shall apply associated policies and procedures.
6. If a member of staff considers that aspects of this policy have not been followed, this should be raised with the Headteacher.
7. This policy does not form part of any employee's contract of employment and it may be amended at any time. Any breach of this policy will be taken seriously and may result in disciplinary action.
8. This policy will be implemented in conjunction with the following policies:

- Data Protection Policy; and
- Records Management Policy.

Aims

9. To ensure the rights and obligations with respect to the use of CCTV systems are understood.
10. To ensure the effective security and protection for CCTV data.
11. To ensure PMGHS fulfils its statutory responsibilities.
12. To support the mission, vision, and values of PMGHS.

Who is responsible for this policy?

13. PMGHS Governors have overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant policies. PMGHS Governors have delegated day-to-day responsibility for operating the policy to the Headteacher.
14. The Local Governing Body and Senior Leadership Team at PMGHS have a specific responsibility to ensure the fair application of this policy and all members of staff are responsible for supporting colleagues and ensuring its success.

Roles

15. Data Controller –PMGHS is registered with the Information Commissioners Office (ICO Registration Z3178321) as the Data Controller for the school it determines the purpose, and the manner in which, any personal data (including that from CCTV) is processed. Our registration includes the use of CCTV systems.
16. Data Protection Officer – is appointed by PMGHS and has the following relevant responsibilities:
    - Ensuring that CCTV footage is obtained and managed in line with legal requirements.
    - Managing requests for access to CCTV footage by a Data Subject or Third-party.
17. System Manager - is the Headteacher and has the following relevant responsibilities:
    - Ensuring the requirements of the CCTV Policy are implemented.
    - Agreeing roles for the 'Establishment Record of CCTV Authorised Users' (Appendix 1)
    - Ensuring an up-to-date Data Protection Impact Assessment (DPIA) is in place that reflects the use of their establishments CCTV system,
    - Ensuring the management and maintenance of the CCTV system, including agreeing the location of cameras.
    - Nominating a member of their Senior Leadership Team (SLT) as the System Operator.

18. System Operator – is the nominated member of SLT for each establishment and has the following relevant responsibilities:
    - To support the System Manager as the nominated SLT lead for implementing the requirements of the CCTV Policy.
    - Ensuring the 'Record of CCTV Authorised Users' is accurate and up to date.
    - Completion of 'Annual Checklist of CCTV Operation' (Appendix 2).
    - Ensuring access to recordings from the CCTV system is restricted to Authorised Users only.
    - Ensuring the 'CCTV Viewing and Download log' (Appendix 4) is accurate and up to date.
    - Ensure that CCTV footage is only retained in line with the requirements of this policy.
    - Ensure regular checks are undertaken to ensure cameras are working, supporting clear footage with the correct field of view.
    - Ensuring that any cameras that present faults are repaired immediately.
    - Ensure regular checks are undertaken to enable live and recorded images with the required storage capabilities of the system (paragraph 44).
19. System Users – are the limited members of staff for each establishment who have been supplied with a password to enable the viewing and downloading of recorded CCTV footage. They must ensure their access is only used for permitted reasons and undertaken in line with this policy.

Compliance

20. This policy has due regard to legislation including, but not limited to, the following:
    - The Data Protection Act 2018;
    - The General Data Protection Regulation;
    - The Protection of Freedoms Act 2012;
    - The Regulation of Investigatory Powers Act 2000;
    - The Freedom of Information Act 2000;
    - The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016).
21. This policy has due regard to the following statutory and non-statutory guidance:
    - Home Office (2013) 'The Surveillance Camera Code of Practice'.
    - ICO (2017) 'In the picture: A data protection code of practice for surveillance cameras and personal information.

Use of CCTV

22. CCTV will be installed in PMGHS to:
    - act as a deterrent against criminal activity and/or disorder.
    - facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order.
    - safeguard pupils, staff and visitors in the establishment.
    - help ensure public safety at our establishments.
23. The system will not be used:
    - to direct cameras upon individuals unless an immediate response to an incident is required.
    - to provide recorded images for social media or the internet.
    - to record sound.
    - for any automated decision taking.

System Installation and review

24. intending to install, modify or change their existing CCTV system must firstly consult with the ICT support team and the governors for an up-to-date CCTV specification document.

25. An ‘Annual Checklist of CCTV Operation of the purpose and usage of a CCTV system will be conducted by the System Operator and kept on file (Appendix 2).

Data Protection Impact Assessment (DPIA)

26. The Governors will complete a template DPIA, which will cover CCTV systems at all sites. This will consider the necessity and proportionality of the systems, as well as identifying any potential risks and solutions.
27. The System Manager will ensure the template DPIA is reflective of the CCTV system proposed or in use for PMGHS.
28. A DPIA will consider the aim of the system, if a CCTV system would be justified and will also consider any alternative solutions.
29. A copy of the DPIA will be retained by the establishment.

Signage

30. CCTV signage should contain details of who it is operated by, the purpose of use and a contact telephone number (Appendix 3).
31. CCTV signage must be in place at all access routes to areas covered by the CCTV, i.e., entrance gates, car parks and recreational spaces. This will inform staff, students, visitors and members of the public of the system as required by the Data Protection Act.

Cameras and their location

32. The CCTV system may comprise of a number of different types of camera i.e. Fixed position or Pan Tilt and Zoom cameras.
33. Cameras will be located at strategic points, principally at the entrance and exit point of the site and inside some buildings.
34. Cameras will be positioned for maximum effectiveness and efficiency; however, it cannot be guaranteed that every incident will be detected or covered and ‘blind spots’ may exist.
35. No camera should be hidden from view.
36. Cameras will not be trained on private vehicles or property outside of the school perimeter.
37. Cameras must block any recording of frontages and rear areas of private accommodation or land.

Recordings

38. All CCTV footage must be captured on a password restricted Digital Video Recording system (DVR).
39. Any default passwords set-up for administration or user accounts must be changed.
40. Individual passwords will be assigned to all Authorised Users – these must be kept secure.
41. Where a system does not facilitate the use of more than one password (which are assigned to individual users), the establishment must change the password every 60 days as a minimum, or sooner if it believes the integrity of the password may be compromised. This password should only be known to the Authorised Users – and must be kept secure.
42. Images must be retained for a minimum of 30 days before overwriting. Once a hard drive has reached the end of its use, it must be erased prior to disposal.
43. All DVR will remain the property of PMGHS until disposal and/or destruction.

Live images

44. Designated staff (e.g. Reception staff, SLT and site supervisor out of hours), may monitor live images for immediate security or safeguarding measures, to monitor anyone entering or exiting the building, and for hazard and incident management and prevention.
45. Live images will include footage from cameras on the entrances, exits and external perimeter of the Establishment.
46. The number of cameras from which live images are viewed should be kept to a minimum and restricted to necessary members of staff only.

47. Appropriate measures, such as the siting of monitors away from public view or zooming out when not in use, should be taken so that images cannot be viewed by members of the public or unauthorised members of staff and pupils.

Viewing and downloading of recorded CCTV footage

48. Requests for viewings and downloads of images and recorded footage must be made via the System Manager (Principal), or System Operator (nominated member of SLT).
49. Two members of staff must be present when images are viewed or downloaded. At least one staff member MUST be a member of SLT and an Authorised User.
50. Authorised Users must NOT view images on their own.
51. The viewing or downloading of footage must be recorded on the CCTV Viewing and Download log (Appendix 4). The log must be completed accurately and comprehensively.
52. Images that are downloaded should be retained in line with guidance contained in the Records Management Policy.

Disclosure of CCTV images and individual rights

53. Any request for CCTV footage by a third party or an individual subject, must be reported to and approved by the Data Protection Officer as a Subject Access Request (SAR) under the Data Protection Act.
54. Disclosure of information from the CCTV system must be controlled and consistent with the aims of using a CCTV system.
55. The System Operator must keep a log of any footage released or viewed, by recording the date, time and area. The name of the person(s) that the footage is released to must also be documented.
56. If, in exceptional circumstances, covert surveillance (any use of surveillance which is intentionally not shared with the subjects it is recording. Subjects will not be informed of such surveillance and use falls under the Regulation of Investigatory Powers Act 2000.) is planned, or has taken place, copies of the Home Office's authorisation forms will be retained.

Complaints and requests to prevent processing

57. Any complaints regarding the operation of the CCTV system will be dealt with under PMGHS Complaints Policy
58. Request to prevent processing will be managed under the Data Protection Policy.

Appendix 1: Record of CCTV Authorised Users

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PMGHS looks to regulate the management, operation and use, of Closed-Circuit Television systems (CCTV). It forms part of our commitment to the safeguarding of personal data.
The objective is to help and support staff and students understand their rights and obligations with respect to the use of CCTV systems.
Together with having a CCTV system in place, the Data Protection Act 2018 requires PMGHS to have transparency in the authorised users of the system. Below are the members of the establishment committed to ensuring that the confidentiality of individuals is maintained and that images captured are not discussed or divulged to any unauthorised persons or for any inappropriate use.

Data Protection Officer	Uwais Lunat
	ICT Manager

System Manager	Rehan Patel
	Head Teacher

System Operator	Omar Desai
	Nominated Governor Lead

System Users		
Name	**Position**	**Responsibility/reason for access**
imtiaz panchbhaya	Site manager	External and internal Live view Site Security, Check student incident and security playback
Main Office	N/A	External Live view, monitor in office
ICT support	N/A	Provide ICT support.

Date: 11/11/2022

Appendix 2: Annual Checklist of CCTV Operation

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The CCTV system and the images produced by it are controlled in line with the CCTV Policy

Check Criteria	Criteria met
Notification of the system submitted to the Information Commissioner	
Data Protection Impact Assessment is reflective of current use of the CCTV system, including the siting of cameras	
CCTV signage is fully visible on site and provides up to date contact details for the Establishment	
The 'Record of CCTV Roles' is up to date	
mages from the CCTV system are securely stored on a DVR system, with only nominated password access	
Passwords have been regularly reviewed	
Recorded images are retained for a minimum of 30 days	
Regular checks are carried out to ensure that the system is working properly and produces high quality images	
The CCTV Viewing and Download log is utilised to record requests to view and download footage.	
Staff are aware that all requests to view or download footage from third parties, including the police, are forwarded to the Data protection officer.	

Signature (System Operator): Omar Desai

Date: 11th November 2022

Appendix 4: CCTV Viewing and Download log

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It is a requirement of the Data Protection Act to notify people entering an area that has a CCTV system installed.

- Signs should be clearly visible and legible, state the reason for the system being in place, contain details of the organisation responsible for the system, whom to contact for information and some basic contact details.

An example of a sign is shown below, together with an idea of the information to be included on it.

This system is controlled by:

PMGHS
01772 651906
For information contact the above.

Images are being monitored for the purpose of crime prevention and public /student safety

Appendix 4: CCTV Viewing and Download log

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Date and time	STAFF MEMBERS VIEWING OR DOWNLOADING IMAGES Must be two members of staff present. At least one must be an authorised user who is a member of SLT Authorised users should NOT view images on their own		LOCATION OF CAMERA IMAGES TAKEN FROM	REASON FOR VIEWING/DOWNLOADING OF IMAGES	FURTHER COMMENTS/ACTION TAKEN
	Staff Name 1 (SLT)	Signature			
	Staff Name 2	Signature			
	Staff Name 1 (SLT)	Signature			
	Staff Name 2	Signature			
	Staff Name 1 (SLT)	Signature			
	Staff Name 2	Signature			
	Staff Name 1 (SLT)	Signature			
	Staff Name 2	Signature			
	Staff Name 1 (SLT)	Signature			
	Staff Name 2	Signature			
	Staff Name 1 (SLT)	Signature			
	Staff Name 2	Signature			
	Staff Name 1 (SLT)	Signature			
	Staff Name 2	Signature			
	Staff Name 1 (SLT)	Signature			
	Staff Name 2	Signature			