

Avon House School

Closed Circuit TV Policy and Guidance and Operational Procedures

Summer 2025

Signed _____ Chair of Governors

To be reviewed Summer Term 2026

Avon House School

CLOSED CIRCUIT TV (CCTV) POLICY AND GUIDANCE AND OPERATIONAL PROCEDURES

1. Definitions

- “The school” – Avon House School
- “CCTV Data Controller” – The School as a body corporate is the Data Controller
- “Site Manager” – The school’s Site Manager is Marius Hanganu
- “CCTV Operator” – The school’s designated CCTV Operator is Mr Tony Frederick

2. Introduction

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at the school. The system comprises a number of static cameras located around the school site. All cameras can be monitored from the Main Office.

The School as a body corporate is the Data Controller under the 1998 Act, and the Governors are therefore ultimately responsible for implementation. However, the designated CCTV Data Operator will deal with day to day matters.

This Code follows Data Protection Act guidelines.

The CCTV system and data is owned by the school.

3. Objectives of the CCTV System

- To increase personal safety and reduce the fear of crime
- To protect the school buildings and assets of the school
- To support the Police in a bid to deter and detect crime
- To assist in managing the school

4. Statement of Intent

The CCTV system has been registered with the Information Commissioner (ICO) under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and Commissioner’s Code of Practice.

The school will treat the system and all information, documents and recordings obtained and used, as data which are protected by the Data Protection Act.

The system installed is compliant with the Data Protection Act, Human Rights Act, Regulatory Investigation Powers Act and the National Security Inspectorate

Cameras will be used to monitor activities within the school and public areas for the purpose of securing the safety and wellbeing of the school and its staff, students and visitors and to identify criminal activity actually occurring, anticipated or perceived.

Cameras are focused on the school buildings and around entrances/exits.

Materials of knowledge secured as a result of CCTV will not be used for any commercial purpose. Information transferred to CD/DVD (or other appropriate media) will only be used for the investigation of

a specific crime or incident. Release to the media would only be allowed with the written authority of the Police if this was required by them as part of a Police investigation.

Warning signs, as required under the Data Protection Act, have been placed at key points around the building.

Contact details and procedures for information requests are published on the school's website.

Policy Updated: Summer 2025

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Appendix A: Guidance for CCTV Data Controller

System controllers and operators should adopt the following 12 guiding principles:

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet and identified pressing need.
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them
6. No more images and information should be stored than that which is strictly required for the stated purposed of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use
10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published
11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value
12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date

Appendix B: Operating Procedures for CCTV Data Operator

These operating procedures should be read and followed in conjunction with the following documents:

- Avon House School CCTV Policy
- Avon House School Guidance for CCTV Data Controller

Purposes

The purposes for the use of CCTV cameras at Avon House School are:

- To increase personal safety and reduce the fear of crime
- To protect the school buildings and assets of the school
- To support the Police in a bid to deter and detect crime
- To assist in managing the school

Information recording and handling

Surveillance camera system images and information will be recorded and stored for 14 days after which it will automatically be deleted.

The responsibility for ensuring that these procedures are followed has been allocated to the school's CCTV Data Operator.

Access to data

Access to retained images and information is restricted to the following members of staff:

- Head Teacher and members of the school's Senior Leadership Team
- Bursar
- CCTV Data Operator

Any images retained for a stated purpose must be viewed in the School Office and is restricted to authorised personnel only as listed above. The reason for viewing must be clearly stated and must be necessary or for law enforcement purposes.

A log detailing who has viewed CCTV footage and for what purpose is maintained by the school's CCTV operator.

Disclosures

Recorded material should be stored in a way that maintains the integrity of the information. This is to ensure that the rights of individuals recorded by surveillance systems are protected and that the information can be used effectively for its intended purpose.

Data subjects may legally make a request for accessing recorded images of themselves. If this occurs, the procedures for those operating the system are as follows:

1. There must be a response in writing within 21 days of the designated person receiving the request
2. The designated person must give written reasons if the request cannot be complied with
3. A copy of the request and response must be kept

When such requests are made all staff must be aware that the designated person who should respond to them is the CCTV Data Operator.

The CCTV Data Controller has discretion to refuse any request for information unless there is an overriding legal obligation, such as a court order or information access rights. Once you have disclosed information to another body, such as the police, they become the Data Controller for the copy they hold. It is their responsibility to comply with the Data Protection Act in relation to any further disclosures.

In some limited circumstances it may be appropriate to release information to a third party, where their needs outweigh those of the individuals whose information is recorded. For example, it can be appropriate to disclose surveillance information to a law enforcement agency when one of the purposes of the system is to deter and detect crime.

Checks and Audits

Paragon Security Group will carry out checks to the CCTV system on a regular basis to ensure that procedures are being complied with.

For any technical assistance, **contact Paragon Security Group during normal office hours on 0845 548 0312**