PolyMAT

CCTV Policy and Guidance

Reviewed November 2023
Approved: December 2023
Revision due: December 2024

CCTV Policy

The Trust recognises that CCTV systems can be privacy intrusive.

PolyMAT aid and improve security of buildings and facilities, and for the security and protection of staff and students, PolyMAT operates under an environment of greater control. This covers several areas but this document deals with the implementation and use of CCTV.

Common CCTV systems are now based around digital technology and therefore need to be treated as information that will be processed under the general principles of the Data Protection Act 2018. PolyMAT is committed to ensure that the data will be

- fairly and lawfully processed.
- processed for limited purposes and not in any manner incompatible with those purposes.
- adequate, relevant and not excessive.
- accurate.
- not kept for longer than is necessary.
- processed in accordance with individuals' rights.
- secure.
- not transferred to countries without adequate protection.

Objectives

Review of this policy shall be repeated regularly, and whenever new equipment is introduced, a review will be conducted and a risk assessment put in place. We aim to conduct reviews no later than every two years.

The purpose of the CCTV system is to assist the individual academies in reaching these objectives:

(a)   To protect pupils, staff and visitors against harm to their person and/or property.

(b)   To increase a sense of personal safety and reduce the fear of crime.

(c)   To protect the school buildings and assets.

(d)   To support the police in preventing and detecting crime.

(e)   To assist in identifying, apprehending and prosecuting offenders.

(f)   To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence

(g)   To assist in managing the school.

Purpose of this Policy

The purpose of this Policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at the school. The CCTV system used by the Trust records but does not record sound and are fixed.

CCTV Cameras are not installed in areas (and will not provide coverage of any areas at any time) in which individuals would have an expectation of privacy such as toilets, bathroom sinks, changing facilities, etc.

Statement of Intent

CCTV Cameras are installed in such a way that they are not hidden from view. Signs are predominantly displayed where relevant, so that staff, students, visitors and members of the public are made aware that they are entering an area covered by CCTV. The signs also contain contact details as well as a statement of purposes for which CCTV is used.

The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.

The Trust and Academies will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

The system has been designed so far as possible to deny observation on adjacent private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design have endeavoured to ensure that the system will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible on the site and make clear who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

CCTV images are not retained for longer than necessary, taking into account the purposes for which they are processed. Data storage is automatically overwritten by the system after a period of 31 days.

Recorded images will only be retained long enough for any incident to come to light (e.g., for a theft to be noticed) and the incident to be investigated. In the absence of compelling a need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 6 months.

System Management

Access to the CCTV system and data shall be password protected and will be kept in a secure area.

The CCTV system will be administered and managed by the Trust Premises Manager who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Premises Manager the system will be managed by the Deputy Premises Manager or another suitably trained member of the Trust's Premises team (including a school Premises Manager where applicable).

The system and the data collected will only be available to the System Manager, his/her replacement and appropriate members of the senior leadership team as determined by the Headteacher.

The CCTV system is designed to be in operation between 24 hours each day, every day of the year, though the Trust does not guarantee that it will be working during these hours.

The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.

Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by proving clear, usable images.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

Where a person other than those mentioned above, requests access to the CCTV data or system, the System Manager must satisfy him/herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists access will be refused.

Details of all visits and visitors will be recorded in a system logbook including time/data of access and details of images viewed and the purpose for so doing.

Downloading Captured Data on to Other Media

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures: -

    (a) Each downloaded media must be identified by a unique mark.

    (b) Before use, each downloaded media must be cleaned of any previous recording.

    (c) The System Manager will register the date and time of downloaded media insertion, including its reference.

(d) Downloaded media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a downloaded media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.

(e) If downloaded media is archived the reference must be noted.

(f) If downloaded media is put onto a device, the device will be encrypted and password protected.

Images may be viewed by the police for the prevention and detection of crime and by the System Manager, his/her replacement and the Head of School and other authorized senior leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the downloaded media (and any images contained thereon) remains the property of the Trust, and downloaded media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The Trust also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the school to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until they are needed by the police.

Applications received from outside bodies (e.g., solicitors or parents) to view or release images will be referred to the school's Data Protection Officer and a decision made by a senior leader of the academy in consultation with the academy's' Data Protection Officer.

Complaints about the use of CCTV
Any complaints in relation to the school's CCTV system should be addressed to the Head of School.

Requests for Access by the Data Subject
The Data Protection Act provides Data Subjects – those whose image has been captured by the CCTV system and can be identified - with a right to access data held about themselves, including those obtained by CCTV. Requests for such data should be made to the Head of School.

Public Information
Copies of this policy will be available to the public from the school office.

Appendix 1 – Woolwich Polytechnic School for Boys CCTCV Locations

External Camera Schedule
Camera 1 – Varifocal 4.7 – 90mm lens 4mp Bullet looking towards the main pedestrian gate.
Camera 2 – Varifocal 4.7 – 90mm lens 4mp Bullet looking towards the main Vehicle gate.
Camera 3 – Fixed 4mm lens 6mp Bullet looking towards the Bicycle storage area.
Camera 4 – Fixed 2.8mm lens 6mp Bullet looking towards the front car park.
Camera 5 – Fixed 2.8mm lens 6mp Bullet looking towards the road way and kitchen delivery area.
Camera 6 – Fixed 4mm lens 6mp Bullet looking back towards the road way and kitchen delivery area.
Camera 7 – Fixed 2.8mm lens 6mp Bullet looking towards the side car park.
Camera 8 – Fixed 4mm lens 6mp Bullet looking towards the Humanities pedestrian walk way.
Camera 9 – Fixed 4mm lens 6mp Bullet looking towards the side car park.
Camera 10 – Fixed 2.8mm lens 6mp Bullet looking towards the rear car park.
Camera 11 – Fixed 2.8mm lens 6mp Bullet looking towards the rear car park.
Camera 12 – Fixed 2.8mm lens 6mp Bullet looking towards the rear vehicle gate (Unused?).
Camera 13 – Fixed 2.8mm lens 6mp Bullet looking towards the open gathering area.
Camera 14 – Fixed 4mm lens 6mp Bullet looking towards the Humanities pedestrian walk way.
Camera 15 – Fixed 2.8mm lens 6mp Bullet looking towards the Media resources gathering area.
Camera 16 – Fixed 2.8mm lens 6mp Bullet looking towards the Media resources gathering area.
Camera 17 – Fixed 4mm lens 6mp Bullet looking towards the Media resources gathering area.
Camera 18 – Varifocal 2.8 – 12mm lens 6mp Bullet looking towards the Tech workshop walk way.
Camera 19 – Fixed 2.8mm lens 6mp looking towards the Rm 80/81 area.
Camera 20 – Varifocal 2.8 – 12mm lens 6mp Bullet looking towards the rear mound walk way.
Camera 21 – Fixed 2.8mm lens 6mp Bullet looking towards the rear mound grassy area.
Camera 22 – Fixed 2.8mm lens 6mp Bullet looking towards the rear mound grassy area.
Camera 23 – Varifocal 2.8 – 12mm lens 6mp Bullet looking towards the rear mound walk way.
Camera 24 – Fixed 2.8mm lens 6mp Bullet looking towards the timber building walk way.
Camera 25 – Fixed 4mm lens 6mp Bullet looking towards the rear mound grassy area.
Camera 26 – Fixed 4 x 4mm lens 8mp Panovu looking over the Tennis? courts.
Camera 27 – Fixed 4 x 4mm lens 8mp Panovu looking over the Basketball? courts.
Camera 28 – Fixed 4 x 4mm lens 8mp Panovu looking over the Football pitch.
Camera 29 – Fixed 2.8mm lens 6mp Bullet looking towards the timber building central area.
Camera 30 – Fixed 2.8mm lens 6mp Bullet looking towards the timber building central area.
Camera 31 – Fixed 2.8mm lens 6mp Bullet looking towards the area in front of main Reception.
Camera 32 – Fixed 2.8mm lens 6mp Bullet looking over the garden.
Camera 33 – Fixed 4mm lens 6mp Bullet looking down the walkway behind the timber building.
Camera 34 – Fixed 4mm lens 6mp Bullet looking down the walkway behind the timber building.
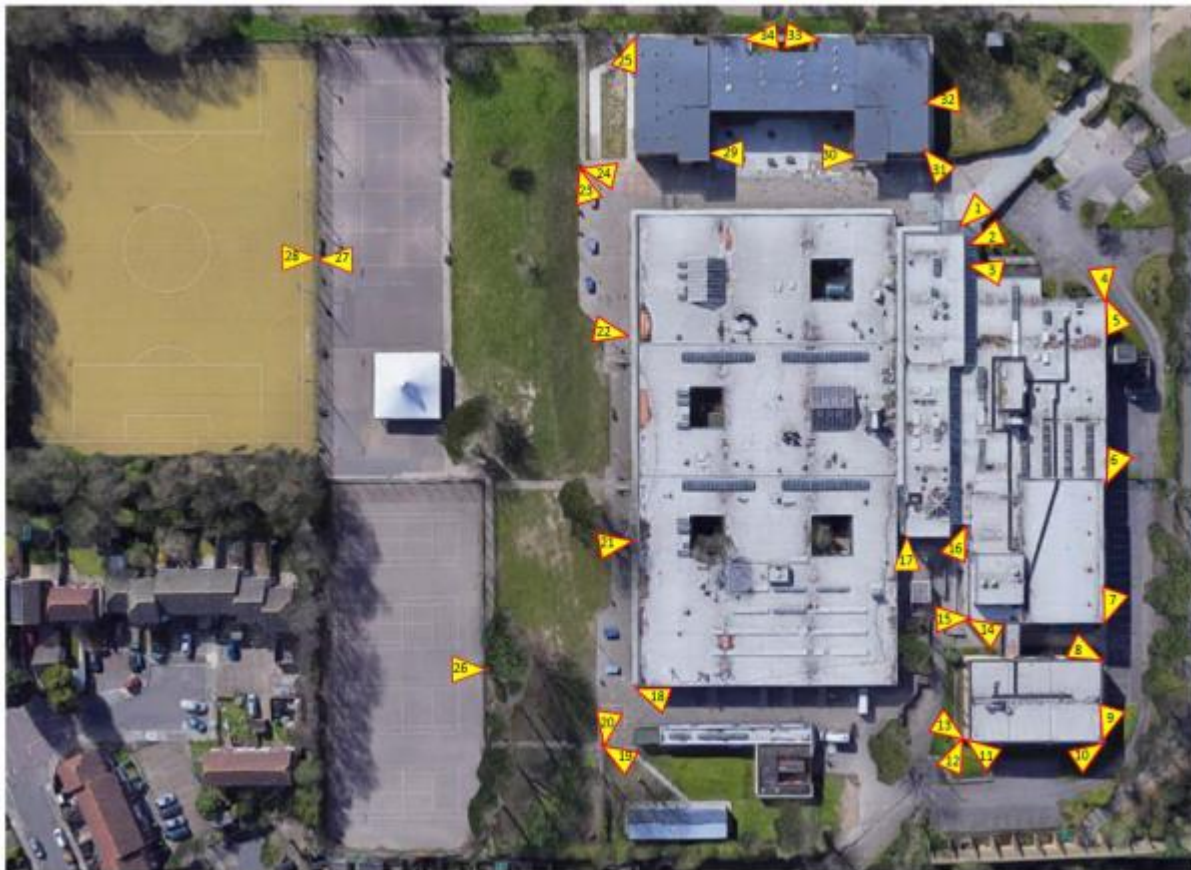
Internal Map for CCTV – Woolwich Polytechnic School for Boys

Appendix 2 – Woolwich Polytechnic School for Girls CCTCV Locations

Camera Type	Internal	Camera Position	Number of Cameras
Hikvison dome	Ground floor	G69	1
Hikvison dome	Ground floor	G67/Sports Hall	1
Hikvison dome	Ground floor	Outside Premises G43	1
Hikvison dome	Ground floor	Stairwell Parks	1
Hikvison dome	Ground floor	Outside G60	1
Hikvison dome	Ground floor	Outside G46	1
Hikvison dome	Ground floor	Outside G40 x 2 camera's	2
Hikvison dome	Ground floor	Outside G36	1
Hikvison dome	Ground floor	Dining Room x 2 camera's	2
Hikvison dome	Ground floor	Quiet Area adjacent Reception	1
Hikvison dome	Ground floor	Inside Library	1
Hikvison dome	Ground floor	Outside G26	1
Hikvison dome	Ground floor	Inside Reception Lobby	1
Hikvison dome	Ground floor	Outside General Office G5	1
Hikvison dome	Ground floor	Outside Polymat office 10	1
Hikvison dome	Ground floor	Outside G 15	1
Hikvison dome	Ground floor	Stairwell Austen	1
Hikvison dome	First floor	Stairwell Parks	1
Hikvison dome	First floor	Outside F62	1
Hikvison dome	First floor	Outside F44 x 2 camera's	2
Hikvison dome	First floor	Outside Music Practice	1
Hikvison dome	First floor	Outside F31 x 2 camera's	2
Hikvison dome	First floor	Stairwell Kahlo	1
Hikvison dome	First floor	Outside F23 x 2 camera's	2
Hikvison dome	First floor	Stairwell Curie	1
Hikvison dome	First floor	Outside F21	1
Hikvison dome	First floor	Outside F06 x 2 camera's	2
Hikvison dome	First floor	Stairwell Austen	1
Hikvison dome	Second floor	Stairwell Parks	1
Hikvison dome	Second floor	Outside S54	1
Hikvison dome	Second floor	Outside S47 x 2 camera's	2
Hikvison dome	Second floor	Outside Science Prep 1	1
Hikvison dome	Second floor	Outside S34 x 2 camera's	2
Hikvison dome	Second floor	Stairwell Kahlo	1
Hikvison dome	Second floor	Outside S25 x 2 camera's	2
Hikvison dome	Second floor	Outside S16	1
Hikvison dome	Second floor	Stairwell Curie	1
Hikvison dome	Second floor	Outside S06 x 2 camera's	2
Hikvison dome	Second floor	Stairwell Austen	1
Hikvison Bullet	External	Back Gate	1
Hikvison Bullet	External	Sports Hall Rear Exit Path	1
Hikvison Bullet	External	Premises/Sports Hall Emergency Exit Path	1
Hikvison Bullet	External	Sports hall into playground	1
Hikvison Bullet	External	Sports hall rear gate footpath	1
Hikvison Bullet	External	Sports hall exit into playground	1
Hikvison Bullet	External	DT to kitchen emergency footpath	1
Hikvison Bullet	External	Kitchen/Bin area	1

Hikvison Bullet	External	Reception to car park	1
Hikvison Bullet	External	Kitchen container	1
Hikvison Bullet	External	Car park to reception	1
Hikvison Bullet	External	Car park disabled area	1
Hikvison Bullet	External	Side gate to canopy	1
Hikvison Bullet	External	Dining room to canopy	1
Hikvison Bullet	External	DT to planter/green	1
Hikvison Bullet	External	Pedestrian crossing/Pedestrian Gate	1
Hikvison Bullet	External	Vehicle Gate	1
Hikvison Bullet	External	Main Car park	1
Hikvison Bullet	External	Hardcourt	1

Appendix 3 – Bannockburn Primary School CCTCV Locations
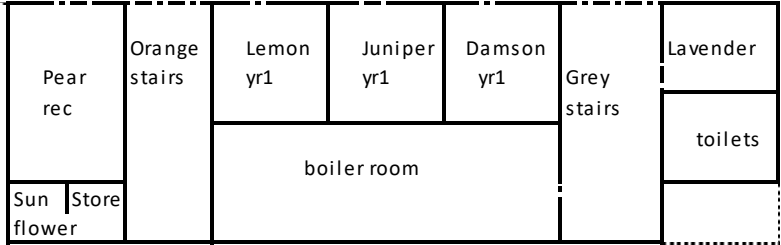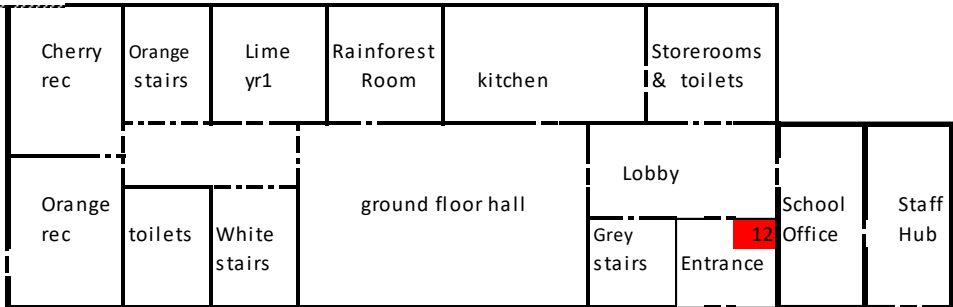
High Street – External Map

High Street – Internal Map

Bannockburn High Street internal CCTV plan Nov 2023

Apple rec

lower ground floor

Pear rec	Orange stairs	Lemon yr1	Juniper yr1	Damson yr1	Grey stairs	Lavender
						toilets

Sun flower | Store

boiler room

ground floor

| Cherry rec | Orange stairs | Lime yr1 | Rainforest Room | kitchen | | Storerooms & toilets | | |

Lobby

| Orange rec | toilets | White stairs | ground floor hall | Grey stairs | Entrance | 12 | School Office | Staff Hub |

Partnership unit

first floor

| Woodlands | Orange stairs | Acer yr2 | Sycamore yr2 | Cedar yr2 | Beech yr2 |

Leadership Office

mezanine floor

| Staff room | toilets | White stairs | first floor hall | Grey stairs | Blossom |
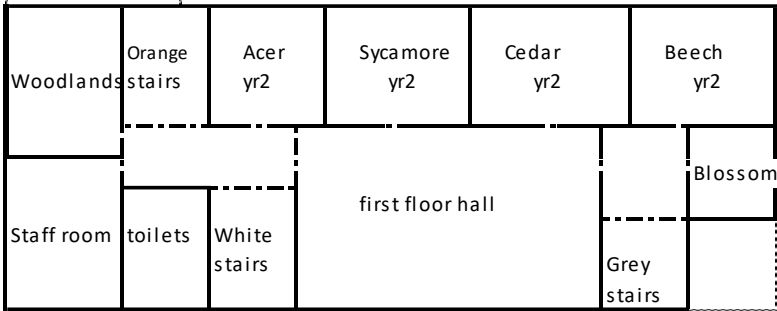
Inclusion Suite

top mezanine floor
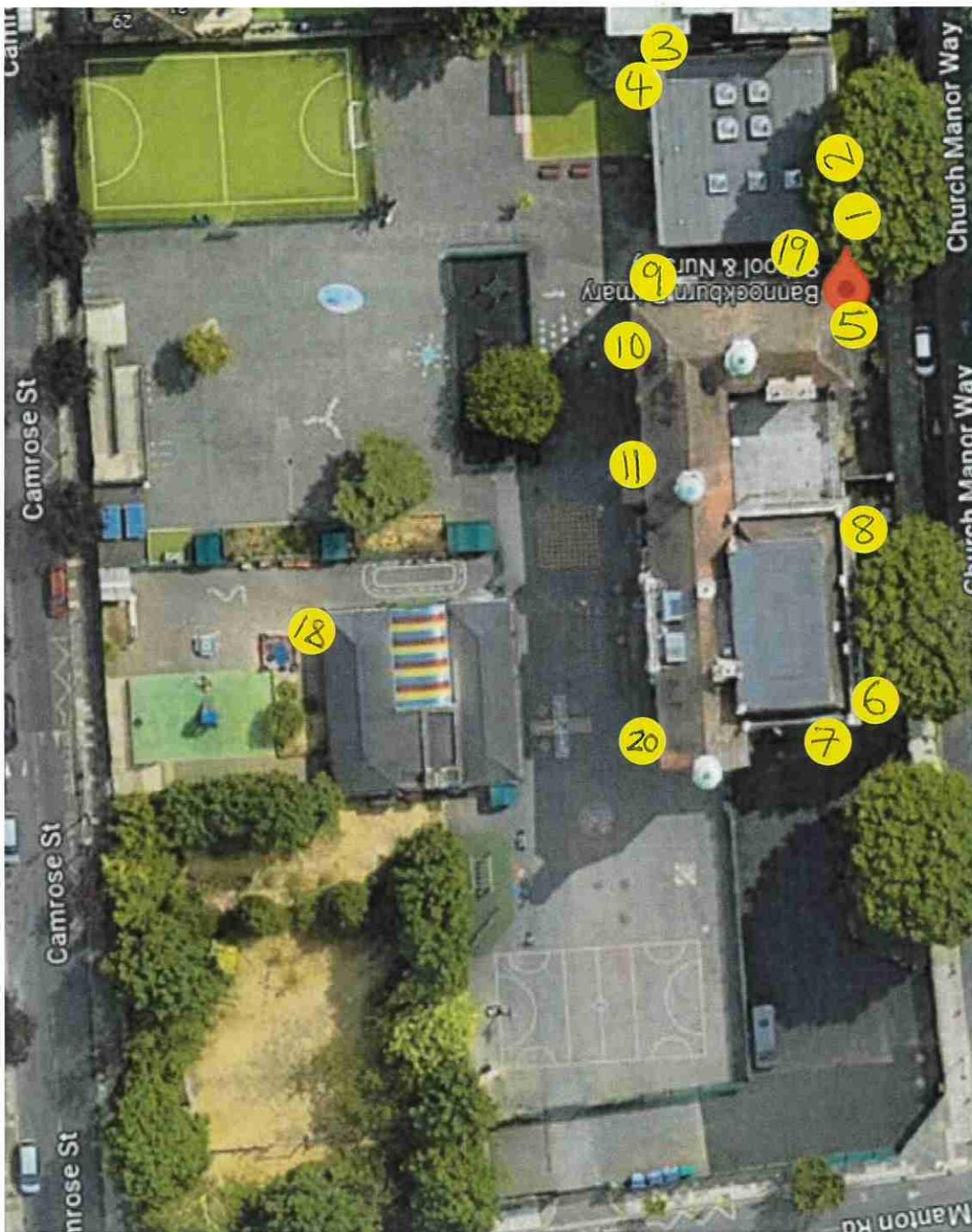
Bannockburn Manorway internal CCTV plan Nov. 2023

top floor   ground floor

12
14
13
15
The Lodge

Walnut	Chestnut
Community kitchen 16	toilets
waiting area	17 entrance
+ School office	
lift & grey stairs	ground floor hall
Kitchen	

GROUND FLOOR

orange stairs

Ground floor mez

Staff room

Ash	Oak
Poplar	toilets
Woodlands room	Orange stairs
lift & grey stairs *	Pine
Maple	Rowan

FIRST FLOOR

1st floor mez
Leadership and Learning

Birch	Elder
Linden	toilets
Orchard	orange stairs
lift & grey stairs *	Elm
Hawthorn	Aspen

SECOND FLOOR

Nursery

(Acorn & Conker)

Magnolia Office   Studio

THIRD FLOOR

FIRE GATES

Bannockburn Camera Schedule:

Bannockburn school cctv camera shedule, Nov 2023		
BMW external map position	Camera type	Camera view
1	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Lodge front entrance
2	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Lodge front entrance
3	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Lodge back area
4	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Lodge playground area
5	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Main school & Lodge entrance
6	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Back of main school
7	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Car park
8	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Main school main door
9	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Main school to Lodge alleyway
10	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Main school playground
11	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Main school staff entrance
18	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Nursery playground
19	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Main school to Lodge alleyway
20	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Main school playground
BMW internal map position		
12	HIKVISION DS-2CE5AH0T-VPIT3ZE(C)	Lodge staircase
13	HIKVISION DS-2CE5AH0T-VPIT3ZE(C)	Lodge ground floor lobby
14	HIKVISION DS-2CE5AH0T-VPIT3ZE(C)	Lodge ground floor hub
15	HIKVISION DS-2CE5AH0T-VPIT3ZE(C)	Lodge ground floor hub
16	HIKVISION DS-2CE79H0T-IT3ZE(2.7-13.5MM)(C)	Main school Lobby (walnut)
17	HIKVISION DS-2CE56D8T-VPIT3ZE	Main school front entrance
BHS external map position		
1	Analogue varifocal box camera	Apple playground
2	HIKVISION DS-2CD2343G2-IU(2.8MM)	Outside playground toilets
3	HIKVISION DS-2CD2343G2-IU(2.8MM)	Main playground
4	HIKVISION DS-2CD2343G2-IU(2.8MM)	Main playground
5	HIKVISION DS-2CD2343G2-IU(2.8MM)	Main playground
6	HIKVISION DS-2CD2343G2-IU(2.8MM)	Football area of playground
7	HIKVISION DS-2CD2343G2-IU(2.8MM)	Orange/Cherry playground
8	Analogue varifocal box camera	External metal staircase exit
9	HIKVISION DS-2CE56D8T-VPIT3ZE	Breakfast & Playclub door
10	HIKVISION DS-2CE56D8T-VPIT3ZE	Main school office entrance
11	Analogue varifocal box camera	car park
BHS internal map position		
12	TBC	Main school office reception