1. Introduction

1.1 The purpose of this is to regulate the management, operation and use of the closed circuit television (CCTV) system at City of Birmingham School (hereinafter referred to as “the School”).

1.2 The system comprises a number of fixed and dome cameras located around the school sites. The Policy follows Data Protection Act guidelines.

1.3 Comments from interested parties are welcome and will be considered when the Policy is reviewed by City of Birmingham School Management Committee.

1.4 The CCTV system is wholly owned by the School.

2. Objectives of the System

2.1 Safeguarding of pupils and staff.

2.2 To protect the school buildings and their assets.

2.3 To assist in managing the School.

2.4 To assist in relation to matters other than safeguarding, namely, the promotion of and compliance with Health and Safety standards and taking appropriate disciplinary measures, where so required.

2.5 The system will not be used to monitor staff conduct or performance, except where required to investigate a safeguarding incident, formal complaint or the alleged commission of a crime.
3. Statement of intent

3.1 The School will treat the system and all information, documents and recordings obtained and used therefrom as data which may be deemed personal data requiring protection under the Data Protection Act.

3.2 Cameras will be used to monitor activities within the school circulation areas and its car parks and other public areas as an adequate, relevant and proportionate response to the achievement of the objectives identified at paragraph 2.

3.3 Cameras are not to focus on private homes, gardens and other areas of private property.

3.4 Materials or knowledge secured as a result of the use of the system will not be used for any commercial purpose. The recorded images shall be stored on the system hard drives which will only be released to media or other third parties with the written authority of the Head Teacher and/or Police if appropriate. DVDs containing personal data will never be released to the media or other third parties for any purpose that is not permitted under the Policy without the Data Subject’s consent.

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

3.6 Warning signs, as required by the Code of Practice have been placed at all school sites covered by the school CCTV cameras to inform all persons who may be deemed Data Subjects of the operation of the System.

4. Operation of the System

4.1 For the purposes of the Data Protection Act the Data Controller will be City of Birmingham School. In practice, the System will be managed by the Head of Centre at each site in accordance with the principles and objectives expressed in the Policy.

4.2 The day-to-day management will be the responsibility of the Head of Centre or any other person expressly authorised by the Head Teacher. Other senior personnel may also be authorised by the Head Teacher to view recorded images for the purposes outlined in this Policy.

4.3 The System will be operated 24 hours each day, every day of the year, except for periods of breakdown or necessary maintenance.
5. Control System(s)

5.1. The recording equipment is located at each site all located within the administrative areas of the school. Access to the recordings is by Head of Centre or any other person expressly authorised by the Head Teacher.

5.2. The Head of Centre or authorised senior personnel will check and confirm the efficiency of the System regularly and in particular that the equipment is properly recording and that cameras are functional. A regular check that the date and time stamp recorded on the images is accurate will be made.

5.3. Access to viewing will be limited to people strictly authorised by the Head of Centre or authorised senior personnel. Recorded images will be viewed in a restricted area.

5.3. If out of hours emergency maintenance arises the building services staff, under the direction of the Head of Centre or authorised senior personnel must be satisfied of the identity and purpose of contractors before allowing access to the Control areas.

6. Monitoring procedures

6.1. Camera surveillance will be maintained at all times.

6.2. Monitors are installed in the following Centres and will be used only in accordance with this Policy:

(1) Marywood
(2) Jaffray Site
(3) Millpool
(4) Minerva
(5) Link
(6) Firsbrook

7. Digital recording procedures

7.1. Please see appendix 1

7.2. In order to maintain and preserve the integrity of the DVDs used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

(i) Each DVD must be identified by a unique mark.

(ii) Before use each DVD must be cleaned of any previous recording.

(iii) The Head of Centre or authorised senior personnel shall register the date and time of DVD insert, including DVD reference.
Any DVD required for evidential purposes must be sealed, witnessed, signed by the Head of Centre or authorised personnel, dated and stored in a separate and secure location such as a safe or locked cabinet. If a DVD 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, signed by the Head of Centre or other authorised senior personnel dated and returned to secure location.

7.3 A record will be maintained of the release or viewing of DVDs to the Police or other authorised person(s). A register will be maintained for this purpose. The register will be located with the Head of Centre or authorised senior personnel.

7.4 Should a DVD be required as evidence, a copy may be released to the Police under the procedures described in paragraph 7.2 (iv) of this Policy. DVDs will only be released to the Police on the clear understanding that the recording remains the property of the School, and both the DVD and information contained on it are to be treated in accordance with this policy. The School also retains the right to refuse permission for the Police to pass to any other person the DVD or any part of the information contained thereon. On occasions when a Court requires the release of an original DVD this will be produced from the secure evidence DVD store, complete in its sealed bag.

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

7.7 Applications received from outside bodies (e.g. solicitors) to view or release personal data stored on DVDs and held by the School will be referred to the Head Teacher. In these circumstances a copy of the relevant DVD will normally be made available for viewing or released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a Subject Access Request, or in response to a Court Order. A maximum fee of £10 can be charged in such circumstances.

8. Breaches of the Policy (including breaches of security)

8.1 Any breach of the Policy by School staff or any other person with delegated responsibility under the Policy will be initially investigated by the Head Teacher, in order for the appropriate disciplinary action to be initiated.

8.2 Any serious breach of the Policy will be immediately investigated and an independent investigation will be carried out by nominees of the Head Teacher to make recommendations on how to remedy the breach.

8.3 In the event of any breach by the Head Teacher then an independent investigation will be carried out by the Management Committee.

9. Assessment of the System
9.1 Performance monitoring, including random operating checks, will routinely be carried out by the Head of Centre or other senior authorised personnel.

9.2 An independent check on the operation of the system will be undertaken on an annual basis and a Certificate confirming the system is operating correctly will be issued and retained.

10. Complaints

10.1 Any complaints about the School’s CCTV System should be addressed to the Head Teacher or Chair of Governors.

10.2 Complaints will be investigated in accordance with paragraph 8 of the Policy and following the school’s complaints procedure.

11. Access by the Data Subject

11.1 The Data Protection Act provide Data Subjects (individuals to whom "personal data" relate) with a right of access to personal data held about themselves (including images recorded by the System and stored on DVDs), under the terms of the Act.

11.2 Requests by Data Subjects for such access should be made in writing to the Head Teacher.

11.3 The form of access granted may consist of facilities being offered at the School premises to view the relevant personal data or the release of a copy DVD storing the relevant personal data.

12. Public information
Copies of this Policy will be available via the school website or on written request to the Main School Office.
### Appendix 1

<table>
<thead>
<tr>
<th>Centre</th>
<th>Marywood</th>
<th>Jaffray Campus</th>
<th>Millpool</th>
<th>Minerva</th>
<th>Link Centre</th>
<th>Firsbrook</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provider</td>
<td>ADT</td>
<td>ADT</td>
<td>ADT</td>
<td>Elgon Security</td>
<td>ADT</td>
<td>ADT</td>
</tr>
<tr>
<td>System</td>
<td>Digital / HD Concept Pro</td>
<td>Digital / HD Concept Pro</td>
<td>Digital/ American Dynamics Controller</td>
<td>Digital multiplexer</td>
<td>Digital / Concept Pro</td>
<td>Digital/Concept Pro HD</td>
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<tr>
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<td>1</td>
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<td>1</td>
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<tr>
<td>Cameras</td>
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<td>13 (1 Internal)</td>
<td>8 (1 Internal)</td>
<td>9 (1 internal)</td>
<td>6 (2 Internal)</td>
<td>8 (3 Internal)</td>
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<td>8</td>
<td>9</td>
<td>6</td>
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