



HYMERS
COLLEGE

CLOSED CIRCUIT TELEVISION POLICY

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HYMERS COLLEGE CLOSE CIRCUIT TELEVISION POLICY

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1.0 Introduction

Due to the layout of both Hymers College and Hymers Hessle Mount, throughout the normal school day, there are multiple entrances to school grounds and facilities. Both schools are fitted with access controls to all external doors, those being either electronic access or simplex combination locks, or a mixture of both. So to assist in the security of both sites and for the safety of staff, pupils and visitors, the College uses Close Circuit Television (CCTV) to monitor and record both internal and external areas of buildings and grounds.

1.1 Aim

The aim of this policy is to ensure that there are correct procedures and processes in place to ensure the use of CCTV and its associated technology is used in accordance with and compliant under the General Data Protection Regulations (GDPR) 2018.

The use of CCTV is solely intended for the purpose of:

- Protection of school assets both in the day and out of school hours
- Promoting the health and safety of staff, pupils and visitors to include lone working
- Reducing crime, anti-social behaviour, theft and vandalism
- To support Humberside Police in the detection and deterrence of crime
- Ensuring school rules are respected and complied with
- Prevention of bullying

2.0 Scope

This policy relates to the use of CCTV and recording equipment at both Hymers College and Hymers Hessle Mount, in their buildings and externally covering their respective grounds and facilities.

3.0 Responsibilities

3.1 Governors

The Board of Governors will support the Headmaster in ensuring that there are adequate provisions in place for the correct installation and use of CCTV and recording devices on school grounds or in any other property it owns.

3.2 Headmaster

The Headmaster has overall responsibility for health, safety and welfare, which includes the use of CCTV and the recording or capturing of images. They may delegate some responsibilities to a named member of the Senior Leadership Team, Data Controller, Operations Manager, ICT Support and Development Manager, Site Supervisor, Maintenance Caretakers and Maintenance Assistant.

Approve the location of temporary or semi-permanent camera's used for the purposes of crime prevention or poor pupil behaviour.

3.3 Senior Leadership Team

In accordance with the schools health and safety arrangements, it is the responsibility of the Senior Leadership Team (SLT) to ensure that the requirements in this policy are met.

3.4 Data Controller

Currently the Bursar, the Data Controller is responsible for how CCTV images are captured and stored. All requests for information of any kind must be applied for and approved in writing.

3.5 Operations Manager

The day to day operation and use of the CCTV systems to include:

- The installation of equipment both internally and externally and its location.
- Monitor the use of the CCTV and periodically review camera locations.
- Ensure that any external images are in line with the contents of this policy, especially in relation to neighbouring properties so as not to breach the expectation of privacy of an individual.
- Deal with feedback and complaints.
- Ensure adequate signage is in place.
- Ensure that the camera control is used solely for the purposes of monitoring suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.
- Ensure that the camera positioning is not infringing on an individual's reasonable right to privacy in public areas.
- Arrange the service and inspection of camera's and associated equipment on a regular basis.
- Arrange suitable and sufficient training where appropriate.

3.6 ICT Support and Development Manager

Maintenance of the CCTV system and associated equipment to include:

- To date and time stamp check recorded images or videos periodically for accuracy e.g. when UK time switches between summer and winter or when there has been an issue with IT systems.
- To assist the Operations Manager with the installation of CCTV equipment when required.
- Ensuring data stored on the school server is secure and password protected.
- The security of recording equipment within the server room.

3.7 Site Supervisor, Maintenance Caretakers and Maintenance Assistant

- Monitoring the system both in and out of school hours in relation to reported damage/vandalism etc. and for the purpose of staff, pupil and visitor safety.
- Report any concerns in the first instance to the Operations Manager.
- Clean cameras and equipment as and when necessary.

4.0 Definitions

4.1 CCTV

CCTV is a TV system in which signals are not publicly distributed but are monitored, primarily for surveillance and security purposes. Images may then be recorded on DVD or other digital recording media.

4.2 GDPR

The General Data Protection Regulation (GDPR) 2018 is a legal framework that sets guidelines for the collection, processing, handling and storage of the personal information of individuals. All Hymers College staff must comply with these regulations when collecting and storing personal information and data.

4.3 Data

Data is any form of information that can be process. It can be either of the following:

- Electronic – data which is information on a computer or other electronic device or information recorded with the intention of putting it on a device and paper based information.
- Manual – Information that is recorded as part of a filing system or the intention that it could form part of a filing system.

4.4 Personal Data

Data relating to a living individual who is or can be identified from it, either directly or indirectly by one or more factors.

4.5 Requests for Access

This is where an individual makes a request for information to the Data Controller for their personal information.

4.6 Data Processing

Performing an operation or multiple operations on data for the purpose of:

- Obtaining

- Collection
- Recording
- Organisation
- Structuring
- Storage
- Alteration or adaption
- Retrieval
- Consultation
- Use
- Disclosure by transmission
- Dissemination or making available by any means
- Alignment
- Combination
- Restriction
- Erase or otherwise destruct.

4.7 Data Subject

The individual who is the subject of the personal data.

4.8 Data Controller

The person who either alone or jointly with others, determines or controls the use of personal data.

4.9 Data Processor

A person who processes personal data on behalf of the data controller.

4.10 Consent

Any freely given, specific information and data by the data subject who has agreed to the processing of their personal data.

4.11 Third Party

Someone other than the subject, controller or processor under direct authority of the controller or processor who are authorised to process personal data.

5.0 General Principles

Hymers College has a responsibility to ensure that staff, pupils and visitors have a sense of security whilst on school grounds and that property and plant are adequately protected from theft or vandalism. All CCTV cameras and associated equipment and the capturing of images and data relating to this equipment, shall be used in accordance with the General Data Protection Regulations (GDPR) 2018.

Under the Health and Safety at Work etc. Act 1974, the school has a duty to protect the health, safety and welfare of staff and others that may be affected by its business. The use of CCTV and its associated recording equipment is one of the measures used by the school to achieve this and to enhance the quality of school life.

Cameras will be used to monitor activities within the school buildings, grounds, car parks as well as entrance and exit points.

The positioning of any camera should be sympathetic to the local residents and in no way infringe on their right to privacy or point directly onto their property.

Monitoring of public areas within school premises for security and school conduct reasons will be limited in such a way as not to violate an individual's reasonable expectation of privacy i.e. not directly into toilets or changing facilities. It may be used when dealing with complaints such as bullying, harassment etc.

The use of CCTV shall be conducted in a professional, legal and ethical manner and any deviation from this for any other purpose is prohibited i.e. monitoring staff in the performance of their daily duties, race, gender disability etc.

Any information obtained in violation of this policy may not be used in and form part of any disciplinary action against staff or pupils.

6.0 Justification for Use

Due to the layout of the school and the open nature of its boundaries and entry and exits points, the Governors, Headmaster and Senior Leadership Team feel that the use of CCTV and associated recording equipment is justified and appropriate to maintain a safe working and learning environment for staff, pupils and visitors. It will also provide a suitable deterrent to theft and vandalism whilst also protecting lone workers out of normal school hours, as well as enforcing school rules within buildings.

7.0 Signage

Suitable signage will be placed in each location that a CCTV camera(s) will be used to indicate that CCTV and recording is in operation. This will normally be at the building entrance and exit points but in some cases other locations within a building. These signs will also be placed at all external entrance and exit points to school property to cover use of CCTV on its outside areas. A copy of the sign can be found at Annex B of this policy.

8.0 Camera Locations

When locating CCTV internally, due consideration must be given to the reasonable expectation of an individual's right to privacy, such as toilets and changing rooms. The school will endeavour to select locations that are the least intrusive to people's privacy whilst carrying out the requirements of this policy. Cameras will only be placed in areas where the school feels there is a requirement.

CCTV placed externally shall be positioned in such a way as to minimise the recording of passers-by and directly onto neighbouring private property and shall be used for the purpose of:

- Monitoring pedestrian and vehicle access to both grounds and buildings
- Maintaining school rules
- Crime prevention
- Crime investigation
- Monitoring car parks and grounds areas

A full list of camera locations can be found at Annex C of this policy.

8.1 Washrooms

Cameras have been installed in all senior school pupil washrooms, and have been specifically positioned so as only to cover those areas pupils wash and dry their hands. These cameras have been installed to assist with school rules, pupil discipline and for the safeguarding of pupils. Staff who as part of their duties have access to the CCTV network, do not monitor the images but will only refer to any captured data at the request of members of SLT only. A booklet displaying all images from the various washrooms can be obtained from the Deputy Head (Management) if required.

9.0 Covert Surveillance

Hymers College will not engage in covert surveillance. Where this type of surveillance is requested by the Police in writing, it must first be approved by the Headmaster in consultation with the Chair of Governors and may require the consent of a Judge. The school will take legal advice before allowing this type of action to proceed.

10.0 Retention and Storage of Data

Under GDPR there is the requirement that data should not be kept for longer than is necessary for the purpose that it was obtained. It is recognised that the Data Controller must be able to justify the retention period of captured images and videos so generally, this period would be no longer than 14 days. The exception to this would be where the image has captured a crime, such as vandalism or breaking and entry when the investigation may lead to disciplinary action or prosecution.

DVD's or memory sticks that are storing recorded video footage or images that contain any form of peoples personal data will be stored securely by the Headmaster or Data Controller only. Digital images or video footage must be secured on the schools server with access limited to those listed in 11.1. The Data Controller will maintain a suitable log of all images and video's that have been accessed.

No video or image captured on school grounds by CCTV that contains personal data or people will be transmitted to any other member of staff without the express permission of the Data Controller other than those listed in 11.1.

10.1 Police Requests for Data

All requests for information obtained through the use of CCTV from the police will only be released when authorised by the Headmaster after consultation with the Chair of Governors.

Should a request be in the form of a warrant that forms part of a criminal investigation then this must be applied for in writing. On receiving such a request, the school may seek legal advice before its release.

10.2 General Requests for Data

All external requests for information obtained through the use of CCTV must be done so in writing to the Headmaster or Data Controller but the release of information will only be authorised by the Headmaster in consultation with the Chair of Governors. Any request for information must be dealt with within 40 days. The school retains the right to make a charge of £10 against each individual request.

Requests in writing should be sent to:

The Bursar (Data Controller)
Hymers College
Hymers Avenue
Hull
HU3 1LW

No information will be released over the telephone.

Any requests from staff to view CCTV footage as part of an internal process looking in to pupil behaviour or incidents, should be directed to the Operations Manager in the first instance via e-mail. The Operations Manager will seek permission from the Data Controller before downloading or sharing any footage with staff.

Any footage shared amongst staff will only be done so by being placed on the secure Google Drive and be time limited to 2 weeks before being removed by the Operations Manager. These images are not to be downloaded in anyway without the express permission of the Data Controller.

11.0 Access

All equipment that the school will use to record or capture data will be located within the schools secure server room, with access to it strictly limited to the ICT Support and Development Manager, their staff and those mentioned in 11.1. Other than the ICT Support and Development Manager, no other member of their department shall be given password access without the express permission of the Data Controller.

All recording equipment including those areas on the school server which may be used to store any form of data will be password protected and strictly limited to those

mentioned in 11.1.

11.1 School Staff

The following members of school staff will be allowed to view and access images and videos as part of their day to day duties:

- Headmaster
- Data Controller
- Operations Manager
- Site Supervisor
- Maintenance Caretakers
- Maintenance Assistant
- Hymers College Administration Assistant
- Hymers Hessle Mount Administration Assistant

No other member of staff will be allowed access without the express permission of the Data Controller. Personal passwords are not to be given out under any circumstances. Should other members of staff be allowed access, then this must be under the direct supervision of one of the members of staff listed above.

In cases of pupil and staff disciplinary action, data may be released to members of SLT after authority to do so has been given by the Headmaster and Data Controller.

11.2 Outside Agencies

It is school policy not to release any information to outside agencies unless it falls into one of the following categories:

- Police in pursuit of their duties as detailed in 10.1.
- The Health and Safety Executive
- Statutory bodies dealing with child safeguarding

Any requests for information outside of these will be looked at on an individual basis as detailed in 10.2.

The school employs a third party contractor to maintain fire and security systems but they will have no access to any CCTV equipment or stored data unless under direct supervision of the Operations Manager or Site Supervisor.

12.0 Review

This policy shall be reviewed on an annual basis by the Operations Manager or when any changes to CCTV locations and operations have been made.

CCTV Privacy Impact Assessment for Hymers College

Name of the member of staff responsible for the system	Craig Schofield
Position	Operations Manager

Name of the member of staff responsible for the security of the system	Alan Walker
Position	ICT Support and Development Manager

Name of the member of staff carrying out the assessment	Craig Schofield
Position	Operations Manager

Assessment Date	05 September 2023
Review Date	September 2024

Description of the CCTV System

Describe here roughly where the cameras and recording equipment are located, how they will work, where the main system is to be stored and at what times the system will be in operation.

Hymers College

Exterior cameras are situated at the three main school entrance/exit points along with internal cameras in the Sports Centre, Chemistry corridor, LRC entrance foyers & all three floors, Lodge, Design & Technology entrance points, Modern Languages entrance doorway and both corridors, weights room, main kitchen food prep area, JCR recreation areas along with a further camera in the JCR entrance foyer, No83 entrance foyer, theatre corridor, main kitchen server and pupil washrooms.

Hymers Hessle Mount

Exterior cameras are located to the front of the school covering the driveway and tarmac play area. To the rear there are cameras covering the play area, main foot entrance gate and exit road, with a further internal camera covering the front main entrance.

The system will run continually, ensuring images and video will be captured 24hrs a day which will be stored on a separate hard drive located within the main server room.

Purpose of the CCTV system

Describe why a CCTV system is required on school grounds and what it aims to achieve. Include advantages and disadvantages if applicable.

CCTV is being fitted to aid in the monitoring of the main access/egress points on to school grounds. This along with other mechanisms the school has in place will ensure the health, safety and welfare of staff, pupils and visitors along with child protection concerns whilst on school grounds. The aim is also deter damage to or theft from school property both in the school day and outside normal school working hours. It will also help with the safety of lone workers.

Describe the nature of the processing

How will you collect, use, store and delete data? What is the source of the data and will you be sharing it with anyone? Is there a high risk nature involved in the processing?

Data will be collected on a rolling basis 24hrs per day and stored securely on a separate hard drive within the main school server room. Data will be collected for a period of 14 days, from there it will be recorded over on a rolling programme. Images will be sourced from both internal and external cameras and will only be shared with authorised personnel within school. It may be shared with outside agencies such as the police or HSE, but this will only be released after being authorised by the Headmaster after consultation with Governors and the schools solicitors.

Images that will be captured

Explain here, who and what images will be captured e.g. staff, pupils general public etc.

Images of all pedestrians and vehicles entering or exiting via school gates will be captured by exterior cameras with staff, pupil and visitor images being captured by internal cameras.

Staff with access to the system

Give a full list of all staff who will have access to the system, their job title and why they have access.

1. Mr J P Stanley (Headmaster) – Overall responsibility for all school operations.
2. Mr M Tuckwood-Hill (Data Controller) – Responsible for all GDPR related matters to include requests for information.
3. Mr C A Schofield (Operations Manager) – Day to day management of school facilities, security, external lettings to include damage and accident investigation.
4. Mr A S Walker (ICT Support and Development Manager) – Network and system security only.
5. Mr A Sidebottom (Site Supervisor) – Monitoring of school facilities and site security when on rota both in the week and at weekends.
6. Mr M Trotter (Maintenance Caretaker) – Monitoring of school facilities and site security when on rota both in the week and at weekends.
7. Ms A Hessey (Maintenance Caretaker) – Monitoring of school facilities and site security when on rota both in the week and at weekends.
8. Mr J Smirk (Maintenance Caretaker) – Monitoring of school facilities and site security when on rota both in the week and at weekends.
9. Mrs C Percival (Maintenance Assistant) – Monitoring of school facilities and site security during normal working hours.
10. Mrs S Lawson (Hymers Hessle Mount Administration Assistant) – Monitoring of school facilities and site security during normal working hours.
11. Mrs K Cooper (Hymers Administration Assistant) – Monitoring of school facilities and site security during normal working hours.

How and when will images be accessed?

Explain the circumstances in which images will be accessed by staff, for what purpose and how they will be stored and viewed.

Images will be stored on secure hard drive and will only be viewed by staff as part of their day to day duties. Each member of staff will have a password protected login which will be individual to themselves. Images will be viewed as part of the site security measures and for facilities management.

How will people be made aware that a CCTV system is in operation?

Describe what signage will be used, where it will be located. Where the CCTV policy is located and how it can be viewed. How will parents be informed of the use of the CCTV system?

External signs will be placed on all four school gates with signs being placed in all buildings containing internal CCTV. Signage will display a dedicated link to the school website where the CCTV policy and any associated documents can be accessed. The policy will also be available to staff on the school intranet.

External agency access

Give details of any third party who may be given access to the system and why.

External access may be granted after due consideration by the Headmaster, Chair of Governors with possible consultation with the schools Solicitors. External bodies such as the Police investigating crime, HSE in relation to breaches of legislation and accident investigation and local authority for child protection related matters may be given access.

System Security

Explain how the system will be secured to include camera security.

All external cameras will be at least 2 meters above ground level with external cable containment kept to a minimum. Internal cameras where possible will only be accessible by the use of steps or ladders with cable containment above ceilings. Cameras if possible will be positioned in such a way to ensure that they are overlooked by another camera. Data storage will be on a dedicated hard drive, secured in the schools server room on its own VLAN run over the schools fibre optic system.

Data retention

Explain how long data will be held for, how it will be deleted and who will be responsible for this.

Generally data will be kept for a maximum of 14 days, after this time it will be recorded over unless it is part of an ongoing Police/HSE/LA etc. investigation or part of disciplinary action taking place within school.

The impact on people's privacy

Detail how you will minimise the impact of CCTV on people's reasonable right to privacy, especially in public areas.

Cameras will be positioned in such a way as not point directly into areas such as changing rooms and toilet facilities within school or at private residences outside of the school boundary. Where this is unavoidable, images will be blocked out on the system so they cannot be seen or accessed by staff.

Other relevant information

Identify and assess risks and controls

Describe the source of the risk and nature of the potential impact on individuals and how these risks will be reduced or controlled.

Risk	Controls
<p>Intrusion on privacy</p> <p>Mutual trust and confidence</p> <p>Loss of personal data</p>	<p>Cameras to be positioned in such a manner as not to intrude on a person's right to reasonable privacy whilst on school grounds.</p> <p>System only to be used in accordance with this policy. Everyone with access to the system to receive adequate training and be made aware of their obligations and the requirement for confidentiality at all times. Data collected will not be used to track work performance. Employees made aware of the installation locations of cameras and their intended use and the reasons for monitoring. Employees given the chance to voice their concerns at any time via SMT.</p> <p>Data captured will be relevant to the schools needs and stored in a secure location. Access to the system restricted to key personnel only.</p>

Conclusions on use of CCTV

Detail your conclusions on the use of CCTV taking into account all the information above. Consider whether further actions are required and whether there may be the need for further restrictions to be placed on how to minimise the impact on privacy and any further actions that may be required.

In summary, the installation of CCTV within Hymers College is to augment site security and for the safety of staff, pupils and members of the public that enter school grounds and facilities. It will also help with crime prevention and vandalism within school and give caretaking staff the ability to monitor facilities remotely out of normal school working hours and to assist in the safeguarding of pupils. Whilst it is planned to expand the amount of CCTV installed over the coming years, at this current time the school feels there is no amendments or restrictions that need to be applied or altered.



WARNING
CCTV cameras and recording
In operation

For more information, please contact the
Operations Manager on
01482 347433
Or visit the schools website at
www.hymerscollege.co.uk/CCTV

Annex C

Camera Locations

No	Location	Area Covered
01	Chemistry	Chemistry Corridor
02	Chemistry/Main Hall Crossover	Locker Area
03	Design & Technology	Main School Gate
04	Design & Technology	Ground Floor Workshop Entrance
05	Design & Technology	Ground Floor Stairwell Entrance
06	Junior Common Room	Main Entrance Foyer
07	Junior Common Room	Internal Main Door Entrance
08	Junior Common Room	Café Area
09	Junior Common Room	Quiet Area
10	Kitchen	Cold Stores and rear entrance
11	Learning Resource Centre	Café Entrance
12	Learning Resource Centre	Quad Entrance
13	Learning Resource Centre	Ground Floor Reception Area
14	Learning Resource Centre	Ground Floor Reception Area
15	Learning Resource Centre	1 st Floor Study Area
16	Learning Resource Centre	1 st Floor Study Area
17	Learning Resource Centre	2 nd Floor Lift Exit Corridor
18	Learning Resource Centre	2 nd Floor LRT Reception Area
19	Lodge	Front Entrance Hall
20	Lodge	Kitchen Entrance
21	Modern Languages	Entrance Foyer
22	Modern Languages	Ground Floor Corridor
23	Modern Languages	Ground Floor Corridor
24	Modern Languages	1 st Floor Corridor
25	Modern Languages	1 st Floor Corridor
26	No83	Entrance Porch
27	No83	No83 Entrance gate
28	Physics	Hymers Avenue Side Gate
29	Sports Centre	Dining Hall Emergency Exits
30	Sports Centre	Main Corridor
31	Sports Centre	Main Corridor (ECP End)
32	Sports Centre	Weights Room
33	Sports Centre External Changing Room Doors	East Side of the Junior School and Changing Room Exit Doors
34	Sports Centre External Changing Room Doors	Changing Room Exit Doors
35	Hymers Hessle Mount	Main entrance door
36	Hymers Hessle Mount	Main entrance driveway and play area
37	Hymers Hessle Mount	Rear pedestrian entrance gate and play area

38	Hymers Hessle Mount	Rear entrance driveway and play area
39	Hymers Hessle Mount	Rear Exit Gate
40	Hymers Hessle Mount	Front Car Park
41	Learning Resource Centre	Girls washroom ground floor
42	Learning Resource Centre	Boys washroom ground floor
43	Junior Common Room	Girls washroom ground floor
44	Junior Common Room	Boys washroom ground floor
45	Modern Languages	Girls washroom ground floor
46	Modern Languages	Boys washroom 1 st floor
47	Sports Centre	Girls washroom ground floor corridor
48	Sports Centre	Boys washroom ground floor corridor
49	Theatre	Dining hall corridor
50	Main Kitchen	Servery overlooking tills
51	Main Kitchen	Servery overlooking counters
52	Learning Resource Centre	Gore entrance
53	Learning Resource Centre	Gore hall