Doucecroft School Services includes the school and residential settings.
# Autism Anglia, Doucecroft School Services
## Use of CCTV Systems Policy

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1. Ethos

We welcome individuality and provide a safe and positive learning environment, to enable our students to thrive and meet their full potential preparing them for their future.

Our Mission:

At Doucecroft School Services our mission is that our students:

- Developing – Independence and life skills
- Opportunity – to experience and learn new things
- Understanding – to be understood and valued as an individual
- Creativity – to express myself as an individual
- Encouraged – to try new things and realise my potential
- Confidence – to achieve and develop my self esteem
- Respect – to feel accepted and accept others
- Openness – to share experience and feelings with others
- Fairness – to be recognised for achievement
- Tolerance – accept that everybody is different

2. Introduction

2.1 The policy is intended to inform and advise parents, carers, staff and students of how CCTV (Closed Circuit Television) systems are used within Doucecroft School Services, how confidentiality is maintained, and the restrictions in place in respect for viewing and sharing the recordings.


3. Background

3.1 Under the Protection of Freedoms Act 2012 the processing of personal data captured by CCTV systems (including images identifying individuals) is governed by the Data Protection Act (and subsequently the EU General Data Protection Regulation) and the Information Commissioner’s Office (ICO) has issued a code of practice on compliance with legal obligations under that Act. The use of CCTV by schools is covered by the Act, regardless of the number of cameras or how sophisticated the equipment is and schools should adhere to the ICO’s code of practice.
4. **Purposes of CCTV**

4.1 Doucecroft School Services use CCTV equipment to provide a safer, more secure environment for students and staff and to prevent bullying, vandalism and theft. It is used for:

- The prevention, investigation and detection of crime.
- The apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings).
- Safeguarding public, student and staff safety.
- Investigating incidents and accidents, where there is an allegation of blame.
- Monitoring the security of the site.
- Investigating damage to the site.

4.2 Doucecroft School Services does not use CCTV for covert surveillance or to routinely monitor the conduct of staff, students or visitors.

5. **Location**

5.1 Cameras are located in those areas where the Doucecroft School Services has identified a need and where other solutions are ineffective. The school's CCTV system is used solely for purposes identified above.

5.2 Cameras will only be used in exceptional circumstances in areas where the subject has a heightened expectation of privacy, e.g. changing rooms or toilets. In these areas, the school will use increased signage in order that those under surveillance are fully aware of its use.

6. **Maintenance**

6.1 The CCTV system is maintained by King's Security under an annual maintenance contract that includes periodic inspections.

6.2 The contractors are responsible for:

- Ensuring Doucecroft School Services complies with its responsibilities in relation to guidance on the location of the camera.
- Ensuring the date and time reference are accurate.
- Ensuring that suitable maintenance and servicing is undertaken to ensure that clear images are recorded.
- Ensuring that cameras are protected from vandalism in order to ensure that they remain in working order.
6.3 The IT department will make termly checks to monitor the ongoing functionality of the CCTV system including its recorded images.

7. Identification

7.1 In areas where CCTV is used Doucecroft School Services will ensure that there are prominent signs placed at both the entrance to the school and within the controlled area.

7.2 The signs will:

- Be clearly visible and readable.
- Contain details of the organisation operating the scheme, the purpose for using CCTV and who to contact about the scheme.
- Be an appropriate size depending on context.

8. Type of Equipment

8.1 Doucecroft School Services’ CCTV cameras record visual images only and do not record sound.

9. Administration

9.1 The data controller, Autism Anglia, has responsibility for the control of images and deciding how the CCTV system is used. Autism Anglia has notified the Information Commissioner’s Office of both the name of the data controller and the purpose for which the images are used.

9.2 All operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images.

9.3 All operators are trained in their responsibilities under the CCTV Code of Practice.

9.4 Access to recorded images is restricted to staff that need to have access in order to achieve the purpose of using the equipment.

9.5 All access to the medium on which the images are recorded is documented.

9.6 All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

9.7 Under the Schools (Specification and Disposal of Articles) Regulations 2013, Doucecroft School Services staff can view CCTV footage in order to make a decision as to whether to search a student for an item. If the recorded footage reveals that theft has been committed by a member of staff, this evidence may be used in a disciplinary case.
10. **Image Storage, Viewing and Retention**

10.1 Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific times and dates to be identified.

10.2 Recorded images may only be viewed with approval from either:

- The Head Teacher.
- The Assistant Head Teachers.
- Business Manager.
- Care Manager.
- An Investigating Officer acting under Autism Anglia’s Disciplinary Policy, who may only authorise access to images relating to the incident they are investigating.

10.3 Recorded images can only be viewed in restricted areas by approved staff as above. The recorded images are viewed only when there is:

- Suspected criminal activity.
- An incident relating to the safety or wellbeing of students, staff or visitors.
- An incident relating to the security of or damage to the site.

10.4 CCTV images are not used for routine monitoring of students, staff or visitors.

10.5 Douccroft School Services reserve the right to use images captured on CCTV where there is activity that the school cannot be expected to ignore such as criminal activity, potential gross misconduct, or behaviour which puts others at risk. Images retained for evidential purposes will be retained in a locked area accessible only by the senior management team and those investigating the incident. Where images are retained, the system administrator will ensure the reason for its retention is recorded, where it is kept, any use made of the images and when it is destroyed.

10.6 Unless the images need to be further retained for any of the purposes stated above, recorded images will be automatically erased after 30 days.
11. Disclosure

11.1 Disclosure of the recorded images to third parties can only be authorised by the data controller. Disclosure will only be granted:

- If its release is fair to the individuals concerned.
- If there is an overriding legal obligation (e.g. information access rights).
- If it is consistent with the purpose for which the system was established.

11.2 All requests for access or for disclosure are recorded. If access or disclosure is denied, the reason is documented.

11.3 Disclosure may be authorised to law enforcement agencies, if withholding it would prejudice the prevention or detection of crime.

12. Subject Access Requests

12.1 Individuals whose images are recorded have a right to view images of themselves and, unless they agree otherwise, to be provided with a copy of the images. If Autism Anglia, including Doucecroft School Services, receives a request under the Data Protection Act, it will comply with requests within 30 calendar days of receiving the request. The school may charge a fee for the provision of a copy of the images. Requests for access should be addressed to the data controller.

12.2 Doucecroft School Services will undertake to obscure the identities of individuals other than the data subject depicted in all images shared under a subject access request.

12.3 Refusal to disclose images may be appropriate where its release is:

- Likely to cause substantial and unwarranted damage to that individual.
- To prevent automated decisions from being taken in relation to that individual.

13. Monitoring and Evaluation

13.1 Doucecroft School Services undertake regular audits to ensure that the use of CCTV continues to be justified. The audit includes a review of:

- Its stated purpose.
- The location.
- The images recorded.
- Storage length and deletion.
14. **Review**

14.1 The efficacy of this policy will be reviewed annually by the governing body. If Doucecroft School Services decide to change the way in which it uses CCTV, it will inform the Information Commissioner within 28 days.