

Framwellgate School Durham CCTV Usage

Date of Last Review: July 2023 Review Period: Annually

Date of Next Review: July 2024

1. Introduction

Framwellgate School Durham is a large secondary school located on the outskirts of Durham City. The size of the site makes it impossible to secure the perimeter, so we have therefore looked at alternative ways of providing security both for our students and the public and to assist in the prevention of theft or damage to the school or its property. The main legislation in this area is the Data Protection Act 1998 (replaced on 25 May 2018 by the General Data Protection Regulation GDPR), the Regulation of Investigatory Powers Act 2000 and the Protection of Freedoms Act 2012. We have notified the Information Commissioner's Office (ICO) that Framwellgate School Durham operates a CCTV system.

2. Purpose of this document

The purpose of this document is to outline the management and operation of the closed circuit television (CCTV) system at Framwellgate School Durham. It also serves as a notice and a guide to data subjects (including students, parents, staff, volunteers, visitors and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the System). The System is administered and managed by the school, which acts as the Data Controller. This document is reviewed annually and should be read with reference to the school's Data Protection & Privacy Policy (available on our website). We conduct an annual audit and review of our use of CCTV using the checklist in Appendix 2 of the ICO's CCTV Code of Practice. This was last completed in April 2023. Records are kept by the Academy Business Director. The school's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the school believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

3. Objectives of the System

- 3.1 To protect the personal safety of students, staff, volunteers, visitors and members of the public.
- 3.2 To protect the school buildings and equipment, and personal property of students, staff,

volunteers, visitors and members of the public.

3.3 To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.

3.4 To monitor the security and integrity of the school site and deliveries and arrivals.

3.5 To monitor staff and contractors when carrying out work duties.

3.6 To monitor and uphold discipline among pupils in line with the Code of Conduct, which is available to parents and students on request.

4 Positioning

4.1 Locations have been selected, both inside and out, that the school reasonably believes require monitoring to address the stated objectives.

4.2 Adequate signage has been placed in prominent positions to inform staff and students that they are entering a monitored area, identifying the school as the Data Controller and giving contact details for further information regarding the system.

4.3 No images of public spaces will be captured except to a limited extent at site entrances.

We have 51 CCTV cameras, all of which are equipped with IR night vision and are vandal and weather- proof. Our main monitor is located in the Network Server Room.

The cameras are listed here:

Sjøvoll Centre reception	Sports hall corridor
Sports hall fitness suite	B Block canopies 2
Sports hall external ramp	B Block side
Sports hall classroom 2	Sports hall main hall 1
Sports hall main hall 2	A block kitchen external
Sports hall main reception	Sports hall external top yard
Sports hall external front pitch	Sports hall external boiler house
Sports hall pumphouse 1	Sports hall pumphouse 2
B block external	B Block male washbasins
B block canopies	D block D1 entrance
C block front	Sports hall top yard
Turning circle	A10
Newton Drive pedestrian gate	Vehicle entrance
D block car park	Gym corridor
Kielder	Sjøvoll room 4
Sjøvoll room 3	Einstein's 1
B block kitchen prep area	A block stairs
Student reception	Student reception external
Sixth form	Main reception
B block main corridor	Da Vinci's

B block female washbasins	Gym male washbasins
Gym female washbasins	A block male washbasins
A block female washbasins	C block main entrance
Main reception	Pedestrian entrance
Sjovoll Café	
A block carpark	B block kitchen containers

5. Maintenance

5.1 The CCTV System will be operational 24 hours a day, every day of the year.

5.2 The System Manager (defined below) will check and confirm that the System is recording and that cameras are functioning correctly, on a regular basis.

5.3 The System will be checked and (to the extent necessary) serviced regularly.

6. Viewing of Images

6.1 Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of, or opportunity for, access by unauthorised persons.

7. Storage of Data

7.1 The day-to-day management of images will be the responsibility of the Site Manager, who acts as the System Manager, or such suitable person as the System Manager shall appoint in his absence.

7.2 Images will be stored for 22 days and automatically over-written unless the school considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.

7.3 Where such data is retained, it will be retained in accordance with the Act and our Data Protection & Privacy Policy. Information including the date, time and length of any recording if applicable, as well as the locations covered and groups or individuals recorded, will be recorded in a logbook. The logbook is kept in the main school office.

8. Access to Images

8.1 Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

8.2 Individuals also have the right to access personal data the school holds on them (please see the Data Protection Policy & Privacy Notice on our website), including information held on the System, if it has been kept. The school will require specific details including at least time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

8.3 The System Manager must satisfy him/herself of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV images:

- Where required to do so by the Headteacher, the police or some relevant statutory authority;
- To make a report regarding suspected criminal behaviour;
- To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- To assist the school in establishing facts in cases of unacceptable student behaviour, in which case, the parents/carers will be informed as part of the school's management of a particular incident;
- To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 8.2 above;
- To the school's insurance company where required in order to pursue a claim for damage done to insured property; or

8.4 Where images are disclosed under 8.3 above a record will be made in the logbook including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).

8.5 If images are provided to third parties under 8.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

The following staff have access to the CCTV:

- Site Manager (System Manager)
- Network Manager

9. Other CCTV systems

The school does not own or manage third party CCTV systems, but may be provided by third parties with images of incidents where this is in line with the objectives of the school's own CCTV policy and/or its Code of Conduct.

10. Complaints and queries

Any complaints or queries in relation to the school's CCTV system, or its use of CCTV, or requests for copies, should be referred to Tony Wilcock, Site Manager, Framwellgate School Durham, Newton Drive, Durham, DH1 5BQ 0191 3866628.