

Residential Provision CCTV Policy

Langham Oaks School



Approved by: [Name] Date: [Date]

Last reviewed on: [Date]

Next review due by: [Date]

Contents

Overarching principle.....	3
Guiding principles of decision making	3
Regulations and Guidance effecting decision making	3
Residential Provision CCTV installation.	4
The system	4
Siting of Camera.....	5
Covert Monitoring.....	5
Storage and Retention of CCTV Images	5
Live Monitoring.....	5
Access to CCTV Images.....	6
Data Protection	6
Subject Access Requests (SAR)	6
Access to and Disclosure of Images to Third Parties	7
Complaints	7
Communication of the presence of CCTV within the Residential Provision.....	7
Data Privacy Impact (Risk) Assessment	8
Appendix 1 – CCTV Camera Location.....	9
Appendix 2 – External CCTV Signage	10
Appendix 3 – Internal CCTV Signage	10

Overarching principle

Privacy

Schools must ensure that any use of surveillance equipment, such as CCTV cameras, does not intrude unreasonably on boarders' privacy.

This is set out in standard 5.8 of the DfE's national minimum standards.

Guiding principles of decision making

The school wishes to ensure that:

- Young peoples' rights and privacy is respected in all that we do.
- The residential provision is a positive environment for young people to live and learn in.
- The residential provision is in full compliance with legislation
- The school is able to meet the needs and control measures contained within individual student risk assessments
- Young people, staff, visitors, parents/carers and external agencies are fully informed of any surveillance systems in operation within the residential provision.
- The positive relationships between staff and young people are promoted as best basis for ensuring that young people are able to stay safe. (The provision of any surveillance system does not in any way negate this)
- Young people are confident in the school's efforts to keep them and their belonging safe.

Regulations and Guidance effecting decision making

- Ofsted - Surveillance and monitoring in residential childcare settings

<https://www.gov.uk/guidance/surveillance-and-monitoring-in-residential-childcare-settings>

- Information Commissioner's Office - A data protection code of practice for surveillance cameras and personal information

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

- Department for Education - National Minimum Standards (NMS)

<https://www.gov.uk/government/publications/residential-special-schools-national-minimum-standards>

- Human Rights Act 1998

<https://www.legislation.gov.uk/ukpga/1998/42/contents>

Residential Provision CCTV installation.

A CCTV system is installed within the Langham Oaks Residential provision for the following SAFEGUARDING purposes

- To provide a control measure to support young people with identified risks on student individual risk assessment.
- To support residential staff (including night awake staff in observing the entirety of communal parts of the residential 'flats' while undertaking their duties.
- To provide reassurance to young people that movements of persons in the COMMUNAL AREA are observed and recorded during the evening (When they are in residential building).
- To provide reassurance to young people that movements of persons in the COMMUNAL AREA are observed and recorded during the day (When they are not in residential building), thus providing assurance that their property will not be removed or stolen from flats .

These purposes have been constructed by the school's leadership and approved by the schools executive committee. They will be reviewed on an annual basis (or when the need for changes is identified)

The system

A CCTV system is in operation within the communal parts of the residential provision and records on a 24/7 basis.

Siting of Camera

In the Residential area, cameras are positioned in the main corridors ensuring the boarders

rights to privacy in their bedrooms, toilet facilities and washrooms are adhered to.

NO CHANGES/ADJUSTMENTS/MODIFICATIONS will be made to the siting or focus of cameras in the residential facility prior to the re-approval of this document by the executive committee

- The system comprises 8 fixed cameras (further details of which are recorded in Appendix 1).
- The system does not have sound recording capability.
- All cameras are visible and are labelled (on wall) CCTV, followed by a reference number

Covert Monitoring

No covert monitoring will take place in the residential facility unless instructed by law enforcement AND under the direct instruction of the SEAX Trust CEO

Storage and Retention of CCTV Images

The school retains CCTV images for 30 days.

The school stores CCTV images by saving to CCTV hard drive which is then over-saved on a 30 days rotation. The recordings are stored on site within a secure location

Live Monitoring

The system is routinely monitored during the evening by the residential team. Staff carry out the monitoring on dedicated and encrypted ipads. The monitoring software is only used where the screen is not viewable by any unauthorised persons (This includes students).

Access to CCTV Images

Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

A passcode is required for access and this is known to senior staff and site manager only.

A CCTV access log will be completed when accessing recorded footage of the residential facility.

Data Protection

The school's CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act (DPA). The use of CCTV is covered by the DPA. This policy outlines the school's use of CCTV and how it complies with the legislation.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained about their responsibilities under the CCTV policy. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the GDPR.

All requests should be made in writing using the SAR request form to,

Headteacher Simon Dawson. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example, data, time and location.

The school will respond to requests within one calendar month of receiving the request.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

Please see the Subject Access Request policy for further details.

<https://www.lanhamoaks.com/about/our-policies>

Access to and Disclosure of Images to Third Parties

There will be no disclosure of recorded data to third parties other than to authorised personnel, such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators). Requests by third parties should be assessed using the school's Third Party Request for Information policy.

The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

Complaints

Complaints will be dealt with in accordance with the SEAX Trust Complaints' Procedure.

<https://www.langhamoaks.com/about/our-policies>

Communication of the presence of CCTV within the Residential Provision.

Young People

The young people within the residential provision are informed of the CCTV system and its purpose by.

- Staff during their induction when joining the provision
- In writing within the residential handbook
- Via written signage on all entrances to the provision
- On corridor signs (the monitored area)
- Via stickers on the cameras

Visitors

- Via signing in book
- Via written signage on all entrances to the provision
- On corridor signs (the monitored area)
- Via stickers on the cameras

Staff

- During staff induction

- In writing within the staff policies
- Via written signage on all entrances to the provision
- On corridor signs (the monitored area)
- Via stickers on the cameras

Parents/Carers/External agencies

- Via signed home school residential agreement
- Via school policy

Data Privacy Impact (Risk) Assessment

Risk Management Summary

Risk	Control Measure
Infringement of a young person's privacy	Assessment of need for CCTV prior to operation Awareness of guidance and legislation Sighting of cameras (Principle of public area only)
Lack of information for (Young people, Staff, Parents/Carers, Visitors and External agencies)	Communication of the presence of CCTV within the Residential Provision framework
Operation of the system beyond that identified in the approved policy	Independent visitor Executive Committee scrutiny SLT monitoring
Failure of system to operate	Checking of system been powered up and running by ICT teach as part of weekly checks
Failure to safeguard data	Maintain access control to data systems
Change to legislation	Ongoing monitoring by SLT and consulting relevant support services 'SBM and
Failure to review policy	Review dates added to the school diary
Significant change to reasons for system operation	Ongoing SLT monitoring
Safeguarding observations concerns	Referral to DSL following standard procedures Trust whistle blowing policy

Appendix 1 – CCTV Camera Location

Camera Reference Number	Building	Location	Focus
34	Main Building (Residential)	In Corridor (outside games room)	Corridor (Away from secure door)
35	Main Building (Residential)	In Corridor (opposite end to games room)	Corridor (towards secure door)
36	Main Building (Residential)	In Corridor (on corner)	Corridor (towards Low End)
37	Main Building (Residential)	In Corridor (near staff office)	Corridor (towards High End)
38	Main Building (Residential)	In Corridor (near linen store)	Corridor towards Low End
39	Main Building (Residential)	In Corridor (near residential managers room)	Corridor towards High End
40	Main Building (Residential)	In Corridor (at end)	Corridor towards Low End

Appendix 2 – External CCTV Signage



CCTV operates in the communal stairwells and corridors of the residential provision for the purposes of student safety and wellbeing.

For more information please speak to the School Office or Residential Manager

Data controller: SEAX Trust ICO Registration number: ZA110771
Address: Seax Trust Head Office Fox Crescent Chelmsford Essex CM1 2BN

Appendix 3 – Internal CCTV Signage



CCTV operates in this area for the purposes of student safety and wellbeing.

For more information please speak to the School Office or Residential Manager

Data controller: SEAX Trust ICO Registration number: ZA110771
Address: Seax Trust Head Office Fox Crescent Chelmsford Essex CM1 2BN

Camera No.