

Mawsley Community Primary School



CCTV-Policy

Policy Ownership	F&R
Statutory Requirement	No
Date reviewed by committee	Term 2 2019
School Website	Yes
Formal Review	Term 2 2020

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at our school.

- The CCTV system is owned by the school and is operated in conjunction with our security contractors (Halo Ltd.).
- The system comprises a number of fixed cameras located around the school site. All cameras are monitored from a Central Site Office and are only available to designated staff – members of the Site Team and members of the Senior Leadership and Management Team
- This policy follows the CCTV guidance issued by the former Information Commissioner (ICO), and the school's GDPR Policy.

Objectives of the CCTV policy

The system has been installed by the school with the primary purpose of reducing the threat of crime generally, protecting our premises and helping to ensure the safety of all of our staff, pupils and visitors consistent with respect for the individuals' privacy. These purposes include:

- To increase personal safety of staff pupils and visitors and reduce the fear of crime
- To deter those with criminal intent and protect the school buildings and their assets
- To assist in the prevention and detection of crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property
- To assist in managing the school
- Facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against staff or pupils and assist in providing evidence to Supervisors and/or to a member of staff or student against whom disciplinary or other action is, or is threatened to be taken.

The system will not be used:

- To provide recorded images for the internet.
- To record sound other than in accordance with the policy on covert recording.
- For any automated decision taking

Although every effort has been made to ensure maximum effectiveness of the system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

Statement of intent

- The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Data Protection Act 2018.
- Cameras will be used to monitor activities within the school and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school, together with its visitors.
- Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.
- Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an appropriate authorisation being obtained.
- Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Tapes will only be released to the media for use in the

Investigation of a specific crime and with the written authority of the police. Tapes will never be released to the media for purposes of entertainment.

- The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.
- Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the school CCTV.

Operation of the system

The Scheme will be administered and managed by the Headteacher or her/his nominee, in accordance with the principles and objectives expressed in the code.

The day-to-day management will be the responsibility of both the Senior Leadership & Management Team (SLT) and the Site Supervisor during the day and the Site Supervisor out of hours and at weekends.

The CCTV controls and hardware devices will only be accessed by SLT, the Site Supervisor and our security contractor. The CCTV system will be operated 24 hours each day, every day of the year.

Controls and Hardware

- The Site Supervisor will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.
- Access to the CCTV controls and hardware devices will be strictly limited to the SLT, the Site Team and our security contractor.
- Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.
- Visitors and other contractors wishing to access the CCTV controls and hardware devices will be subject to particular arrangement as outlined below.
- CCTV Operators must satisfy themselves over the identity of any visitors and other contractors wishing to access the CCTV controls and hardware devices and the purpose of the visit. Where any doubt exists access will be refused. Details of all visits and visitors will be endorsed in a log book.
- It is vital that operations are managed with the minimum of disruption. Casual visits will not be permitted. Visitors must first obtain permission from the Site Supervisor, or his deputy and must be accompanied by him throughout the visit.
- Any visit may be immediately curtailed if prevailing operational requirements make this necessary.
- If out of hours emergency maintenance arises, the school must be satisfied of the identity and purpose of contractors before allowing entry.
- A visitor's record will be maintained at school reception. Full details of visitors including time/data of entry and exit will be recorded.
- Other administrative functions will include maintaining hard disc space, filing and maintaining occurrence and system maintenance logs.
- Emergency procedures will be used in appropriate cases to call the Emergency Services.

Monitoring procedures

Camera surveillance may be maintained at all times. A monitor is installed in the main school office to which pictures will be continuously recorded.

Image storage procedures

Images are stored for 3 weeks then are over written. In order to maintain and preserve the integrity of any recordings 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 disc must be identified by a unique mark.
- (ii) Before using each disc must be cleaned of any previous recording.
- (iii) The controller shall register the date and time of disc insert, including tape reference.
- (iv) A disc required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence disc store. If a disc 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 controller, dated and returned to the evidence disc store.
- (v) If the disc is archived the reference must be noted.

- Recordings may be viewed by the Police for the prevention and detection of crime.
- A record will be maintained of the release of discs to the Police or other authorised applicants. A register will be available for this purpose.
- Viewing of discs by the Police must be recorded in writing and in the log book. Requests by the Police can only be actioned with appropriate authorisation under the data Protection Act 2018.
- Discs will only be released to the Police on the clear understanding that the disc remains the property of the school, and both the disc and information contained on it are to be treated in accordance with the ICO's CCTV Code of Practice. The school also retains the right to refuse permission for the Police to pass to any other person the disc or any part of the information contained thereon.
- The Police may require the school to retain the stored discs for possible use as evidence in the future. Such discs will be properly indexed and properly and securely stored until they are needed by the Police.
- Applications received from outside bodies (e.g. parents or solicitors) to view or release discs will be referred to the Headteacher. In these circumstances discs will normally be 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.

Breaches of the policy (including breaches of security)

Any breach of the ICO's Code of Practice by school staff will be initially investigated by the Headteacher, in order for him/her to take the appropriate disciplinary action. Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

Assessment of the scheme and code of practice

Performance monitoring, including random operating checks, may be carried out by the Site Supervisor.

Complaints

Any complaints about the school's CCTV system should be addressed to the Headteacher. Complaints will be investigated in accordance with the school complaints policy.

Access by the Data Subject

The Data Protection Act 2018 provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV. Requests for Data Subject Access should be made to the Headteacher.

Public information

Copies of this policy will be available to the public from the School Office and the school website.

Associated Policy: GDPR