



This Policy applies to:

- Community Schools
- Voluntary Controlled Schools
- Pupil Referral Units

This Policy is recommended for adoption by:

- Voluntary Aided Schools
- Foundation Schools
- Trust Schools

CCTV

Policy

Our Lady &

St Hubert's

Primary

School

Date approved:

May 2018 Contents

	Page No.
1. Introduction	1
2. Objectives of the CCTV Scheme	1
3. Statement of Intent	1 – 2
4. Operation of the CCTV System	2
5. Operational Control	2 – 3
6. Liaison	3
7. Monitoring Procedures	3 – 4
8. Recorded material procedures	4 – 5
9. Record Keeping/Incident Logs	5
10. Retention of Data	6
11. Breaches of the Policy	6
12. Assessment of the CCTV system	6
13. Complaints	6
14. Access by the Data Subject	7
15. Public Information	7
16. Further Information	7
17. Summary of Key Points	8

Appendix:

Plan showing location of all cameras, monitoring equipment, and system control centre within the school buildings and on the school site.

1. Introduction

- 1.1 The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Our Lady & St Hubert's Catholic Primary School hereafter referred to as 'the School'.
- 1.2 The CCTV system is owned by the school.
- 1.3 The system comprises of **Samsung SIR-4160** cameras located in and around the school premises. Appended to this document is a plan of the School showing the location of all cameras, monitors and the system control centre within the school buildings and on the school site.
- 1.4 All cameras are monitored by selected senior, administrative staff and site manager together with those directly involved in the security of the school site.
- 1.5 This Policy follows Data Protection Act guidelines.
- 1.6 Operation of the School CCTV Policy will be reviewed annually by the Board of Directors and will include consultation, as appropriate, with interested parties.

2. Objectives of the CCTV Scheme

- (a) To protect the School buildings and their assets
- (b) To increase personal safety and reduce the fear of crime
- (c) To support the Police in a bid to deter and detect crime
- (d) To assist in identifying, apprehending and disciplining offenders
- (e) To protect members of the public and private property.

3. Statement of Intent

- 3.1 The CCTV Scheme will be registered with the Information Commissioner, if necessary, under the terms of the Data Protection Act 2018 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice 2018
- 3.2 The School will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.
- 3.3 Cameras will be used to monitor activities within the school grounds, the area in front of the school, public areas by the school boundary and roads/pavements bordering the school to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of

securing the safety and well being of the School, together with its visitors.

- 3.4.1 Staff have been instructed to ensure cameras are not able to focus on private homes, gardens and other areas of private property.
- 3.4.2 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 authorisation being obtained for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act, 2000.
- 3.5 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recorded materials will only be released to the media for use in the investigation of a specific crime and with the written authority of the Police. Recorded materials will never be released to the media for purposes of entertainment.
- 3.6 The planning and design has endeavoured to ensure that the CCTV 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.
- 3.7 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.

4. Operation of the CCTV System

- 4.1 The system will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in this Policy.
- 4.2 The day-to-day management will be the responsibility of the school administrator and site manager during the day, out of hours and at weekends.
- 4.3 The CCTV system will be operated 24 hours each day, every day of the year.

5. Operational Control

- 5.1 The Operational Controller will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.
- 5.2 The System Administrator will ensure that **all** staff involved with the operation of the CCTV system are properly trained and fully understand their roles and responsibilities in respect of data protection issues e.g.

- (a) the user's security policy (procedures to have access to recorded images;
- (b) the user's disclosure policy;
- (c) rights of individuals in relation to their recorded images.

Training records will be maintained accordingly.

- 5.3 Access to the viewing monitors will be strictly limited to selected senior and administrative staff together with those directly involved in the security of the School.
- 5.4 Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.
- 5.5 Staff, visitors and others entering areas with CCTV viewing monitors will be subject to particular arrangement as outlined below.
- 5.6 Authorised staff must satisfy themselves over the identity of any other visitors and the purpose of their visit. Where any doubt exists the CCTV images must be turned off.
- 5.7 The system may generate a certain amount of interest. It is vital that operations are managed with the minimum of disruption. Casual observations will not be permitted.
- 5.8 If an emergency arises out of hours, permission must be obtained from the Headteacher to view or process recorded material.
- 5.9 Other operational functions will include maintaining recorded materials and hard disc space, filing and maintaining occurrence and system maintenance logs.
- 5.10 Incidents involving the Emergency Services must be notified to the Headteacher.

6. Liaison

Liaison meetings will be held as required with all staff involved in the support of the system.

7. Monitoring Procedures

- 7.1 Camera surveillance may be maintained at all times.
- 7.2 Pictures will be continuously recorded or when activated by movement.
- 7.3 No covert monitoring will be undertaken until the circumstances have been considered by, and written authorisation obtained from, the Board of Directors
- 7.4 Covert surveillance activities of law enforcement agencies are not covered here because they are governed by the Regulation of Investigatory Powers Act (RIPA) 2000.

7.5 Prior to any request for covert surveillance to be considered, the applicant must be able to justify the request as being exceptional for the following reasons:

- the monitoring relates to behaviour, not to contract performance;
- it is carried out to investigate a suspected criminal activity or malpractice; and
- informing staff is likely to prejudice the above purpose and certain standards for covert monitoring are complied with.

The standards relating to covert monitoring are satisfied if:

- specific criminal activity has been identified;
- a need to obtain evidence by covert monitoring is established;
- following assessment, it is concluded that informing employees would prejudice the gathering of evidence;
- a time period for monitoring has been identified; and
- the provisions of RIPA are complied with.

At the conclusion of any investigation, all covert cameras must be removed from their location(s) and all none relevant data destroyed as soon as possible.

8. Recorded Material Procedures

8.1 In order to maintain and preserve the integrity of the recorded material 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 item of recorded material must be identified by a unique mark.
- (ii) Before use each item on which images will be recorded must be cleaned of any previous recording.
- (iii) The person making the recording shall register the date and time of recorded material insert, including recorded material reference.
- (iv) Any recorded material required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure recorded material store. If recorded material 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 material store.
- (v) If the recorded material is archived the reference must be noted.

- 8.2 Recorded materials may be viewed by the Police for the prevention and detection of crime, authorised officers of the Police for supervisory purposes, authorised demonstration and training.
- 8.3 A record will be maintained of the release of recorded materials to the Police or other authorised applicants. A register will be made available for this purpose provided by Our Lady & St Hubert's Primary School.
- 8.4 Viewing of recorded materials by the Police must be recorded in writing and in a log book. Requests by the Police can only be actioned under section 29 of the Data Protection Act, 1998.
- 8.5 Should recorded material be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1(iv). Recorded materials will only be released to the Police on the clear understanding that the recorded material remains the property of the school, and both the recorded material and information contained on it are to be treated in accordance with this document.
- 8.6 The School retains the right to refuse permission for the Police to pass to any other person the recorded material or any part of the information contained thereon. On occasions when a Court requires the release of an original recorded material this will be produced from the secure recorded material store, complete in its sealed bag.
- 8.7 If the Police require the School to retain the stored recorded materials for use as evidence in the future, such recorded materials will be properly indexed and properly and securely stored until they are needed by the Police.
- 8.8 Applications received from outside bodies (e.g. solicitors) to view or release recorded materials will be referred to the Headteacher. In these circumstances recorded materials 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. If there are uncertainties as to the validity of any request, clarification should be sought initially from the LA's Estates and Facilities Team (tel: 0121-569 8159).

A fee can be charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

9. Record Keeping/Incident Logs

The School will maintain adequate and comprehensive records relating to the management of the system and incidents. Model documents from the installers/providers of CCTV system may be utilised for this purpose.

10. Retention of Data

- 10.1 There are no specific guidelines about the length of time data images should be retained. Consequently, the period of retention will be determined locally, will be documented and understood by those operating the system and will be for the minimum period necessary to meet the objectives of the CCTV scheme. A period of 30 days is considered adequate unless determined otherwise (see 10.2 below)
- 10.2 Where CCTV data is required to assist in the prosecution of a criminal offence, data will need to be retained until collected by the Police.
- 10.3 Measures to permanently delete data should be clearly understood by persons that operate the system. These may be achieved by means of regular rotation of video tape(s) to ensure old data is overwritten or adjusting the image quality on disc based systems to ensure data is overwritten after a set period.
- 10.4 Systematic checks should be carried out to ensure the deletion regime is strictly followed.

11. Breaches of the Policy (including breaches of security)

Any breach of the Policy by School staff will be initially investigated by the System Administrator (identified in section 4.1) to determine disciplinary action, if necessary, and to make recommendations on how to remedy the breach.

12. Assessment of the CCTV System

An annual assessment will be undertaken by the Headteacher to evaluate the effectiveness of the CCTV system.

The outcome of the assessment will be reported to a meeting of the Academy Committee who will determine if the system is achieving the objectives of the scheme, or if the system requires modification.

13. Complaints

Any complaints about the School's CCTV system should firstly be made, in writing, to the Headteacher. Complaints will be investigated in accordance with section 11 of this document.

14. Access by the Data Subject

- 14.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.

If the individual is not the focus of the footage i.e. they have not been singled out or had their movements tracked then the images are not classed as 'personal data' and the individual is not entitled to the image under the provisions of Subject Access – Data Protection Act 1998.

- 14.2 Requests for Data Subject Access should be submitted in writing to the Chair of Academy Committee.

15. Public Information

Copies of this Policy will be available to the public from the School Office.

16. Further Information

Information and advice about the purchase, operation and maintenance of CCTV systems is available from the LA's Estates & Facilities Team (tel: 0121-569 8159).

Information in respect of data protection issues may be obtained from the Council's Data Protection/Freedom of Information Officer (tel: 0121 569 3248).

The Information Commissioners website www.ico.gov.uk will contain the most up to date information and should be consulted on a regular basis to ensure all elements of this policy continue to reflect current guidance.

17. Summary of Key Points

- 17.1 The CCTV system is owned and operated by the School.
- 17.2 The CCTV system will be reviewed annually to evaluate its effectiveness and the Board of Directors will determine if the system is achieving the objectives of the scheme or if modifications are required.
- 17.3 Liaison meetings may be held with the Police and other bodies when a requirement is identified.
- 17.4 Recorded materials will be properly indexed, stored and destroyed after an appropriate period. A period of 30 days is considered adequate unless determined otherwise.
- 17.5 Recorded materials may only be viewed by authorised School staff and the Police.
- 17.6 Recorded materials required as evidence will be properly recorded witnessed and packaged before copies are released to the Police.
- 17.7 Recorded materials will not be made available to the media for commercial or entertainment purposes.
- 17.8 Recorded materials will be deleted from the computer hard drive after a defined period.
- 17.9 No covert surveillance will be undertaken without the written consent of the Board of Directors
- 17.10 Breaches of this policy will be initially investigated by the System Administrator identified in Section 4.1 of this Policy to determine disciplinary action, if necessary, and to make recommendations on how to remedy the breach.

Document produced

(insert date)

Review date

(insert date)

