

Synergy Schools
Brompton on Swale CE Primary School
CCTV Policy

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Method of Communication School website			

Introduction

- The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Brompton on Swale CE Primary School.
- The system comprises a number of fixed and dome cameras located around the school site (see Appendix 1 for a list of camera locations).
- All cameras are monitored from a *Central IT Support Office and are only available to designated staff – members of the ICT Support and Site Teams and members of the Senior Leadership and Management Team.*
- This Policy follows Data Protection Act 1998 guidelines.
- The Policy will be subject to review biennially to include consultation as appropriate with interested parties.
- The CCTV system is owned by the school. The Executive Head Teacher is responsible for compliance with the policy.

Objectives of the CCTV system

- To increase personal safety of staff students and visitors and reduce the fear of crime
- To protect the school buildings and their assets
- To support the Police in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property

- To assist in managing the school

Statement of intent

- The CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998 and complies with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.
- The school will treat the system and all information, documents and recordings obtained and used, as data which is protected by the Act.
- Cameras will be used to monitor activities within the school, its car parks and outdoor areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school staff, pupils and visitors.
- Cameras will be used to monitor activities in school, its car parks and outdoor areas to assist with the safeguarding of pupils.
- Cameras will be sited so they only capture images for the purposes for which they are installed, and care will be taken to ensure that reasonable privacy expectations are not violated. The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act
- Cameras will be positioned so they do not capture images of areas that are not of interest and are not intended to be the subject of surveillance such as individuals' private property including gardens and other areas of private property.
- Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the police for use in the investigation of a specific crime. Recordings 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, and within the area covered (see Appendix 2)

Operation of the system

- The Scheme will be administered and managed by the Headteacher or the Data Controller as defined by the Data Protection Act, 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 Team (SLT) and the ICT Support Manager during the day and the Site Team out of hours and at weekends.*
- *The Central IT Support Office becomes a CCTV Control Room when the CCTV system is accessed by SLT and the Site Team.*
- The CCTV system will be operated *24 hours each day, every day of the year.*

Control Room (in the Central IT Support Office)

- *The ICT Support Manager 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 Control Room will be strictly limited to the SLT & the ICT Support and Site Teams.*

- *Control Room Operators must satisfy themselves over the identity of any other visitors to the Control Room and the purpose of the visit. Where any doubt exists access will be refused. Details of all visits and visitors will be endorsed in the Control Room log book (see Appendix 3)*
- *Visitors to the Control Room must first obtain permission from the ICT Support Manager or SLT and must be accompanied throughout the visit. Any visit may be immediately curtailed if prevailing operational requirements make this necessary.*
- If out of hours emergency maintenance arises, the Control Room Operators must be satisfied of the identity and purpose of contractors before allowing entry.
- A visitor's book will be maintained at school reception. Full details of visitors including time/date of entry and exit will be recorded.
- Emergency procedures will be used in appropriate cases to call the Emergency Services.

Monitoring procedures

- Camera surveillance recording may be maintained at all times.
- A monitor is installed in the Control Room to which pictures will be continuously recorded.
- Covert surveillance will only be undertaken in the most extreme circumstances and must be authorised by the Head Teacher. It must be necessary and proportionate and cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private such as toilet cubicles. Authorisation Forms must be completed and retained. Covert monitoring will cease at the end of each relevant operation.
- Unless an immediate response to an occurring event is required, *staff in the CCTV Control Room* must not direct cameras at an individual or a specific group of individuals.

Image storage procedures

- In order to maintain and preserve the integrity of the disks 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 disk must be identified by a unique mark.
 - (ii) Before using each disk must be cleaned of any previous recording.
 - (iii) The controller shall register the date and time of disk insert, including tape reference.
 - (iv) Footage required for evidential purposes must be sealed, witnessed, signed by the Data Controller, dated and stored in a separate, secure, evidence footage store. If a disk 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 Data Controller, dated and returned to the evidence footage store.
 - (v) If the footage is archived the reference must be noted.
- Footage may be viewed by, and a copy provided to, the Police for the prevention and detection of crime. The Head Teacher will determine whether to make disclosure to the police based upon Section 29(3) of the Data Protection Act 1998. A register will be maintained of the release of footage to the Police or other authorised applicants.
- Viewing of footage by the Police must be recorded in writing on the Authorisation to Access CCTV Images form (Appendix 4) and in the log book (Appendix 3)

- Should footage be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1 (iv) of this Code. The Police become the Data Controller of the footage once it is provided to them. On occasions when a Court requires the release of original footage this will be produced from the secure evidence store, complete in its sealed bag.
- The Police may require the school to retain the stored footage for possible use as evidence in the future. Such footage will be properly indexed and securely stored until they are needed by the Police.
- Disclosure will only take place where there is a legal requirement placed upon the school to do so and, there is legal power upon the school to do so, e.g. in response to a Court Order; in response to a subject access where an individual requests access to footage of themselves; under Section 5 of the DPA where disclosure is necessary for legal proceedings etc. A fee can be charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

Breaches of the policy (including breaches of security)

- Any breach of the 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 ICT Support Manager*.

Complaints

- Any complaints about the school's CCTV system should be addressed to the Headteacher.

Access by the Data Subject

- 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.
- Requests for Data Subject Access should be made to the Headteacher.

Public information

- Copies of this Code of Practice will be available to the public *from the School Office and the Headteacher*.

Summary of Key Points

- This Code of Practice will be reviewed every two years.
- The CCTV system is owned and operated by the school.
- We record for approximately 12 days
- The Control room will not be staffed out of school hours.
- The Control Room is not open to visitors except by prior arrangement and good reason.

- Recorded footage will be properly indexed, stored and destroyed after appropriate use.
- Footage may only be viewed by *Authorised School Officers and Control Room staff*.
- Footage required as evidence will be properly recorded, witnessed and packaged before copies are released to the police.
- Footage will not be made available to the media for commercial or entertainment
- Footage will be disposed of securely by incineration.
- Any breaches of this code will be investigated by the Headteacher. An independent investigation will be carried out for serious breaches.
- Breaches of the code and remedies will be reported to the Headteacher.

Appendix 1

List of Camera Locations

- 1 2 x cameras pointing at main playground from temporary classroom
- 2 1 x camera pointing at main playground from pavilion
- 3 1 x camera pointing at cap park from BOS kids building
- 4 1 x camera pointing at field from BOS kids building
- 5 1 x camera pointing at lower playground from outside class 2
- 6 1 x camera pointing at lower playground from outside class 4

Appendix 2 – CCTV Signage

It is a requirement of the Data Protection Act 1998 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for enquiries



Appendix 4 – BROMPTON ON SWALE CE PRIMARY SCHOOL Authorisation to Access CCTV Images

Date and time of access:
Date and time of incident:
Nature of Incident:
Access request approved by:
Area of School / camera location:
Details of Images observed:
Recordings made (reference): Recording (disk / tape / other media): (include reference or id number) Provided to: Reason: Approved by (SLT):
Covert Surveillance Request Reason: Nature and Duration of covert surveillance: Approved by (SLT): Outcome:

