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CCTV Policy	Issued: February 21
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APPROVAL BY	FULL GOVERNING BODY

CCTV Policy

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1. Policy Statement

This Policy is written in accordance with the requirements of the General Data Protection Regulation ("GDPR") which came into effect on 25 May 2018 [1].

1.1 Alfred Street Junior School (ASJS) uses Close Circuit Television ("CCTV") within the premises of the school. The purpose of this policy is to define the management, operation and use of CCTV at the school.

1.2 This policy applies to all members of staff, including supply and other temporary staff, visitors to the School premises and all other persons whose images may be captured by the CCTV system.

1.3 This Policy has due regard to legislation including, but not limited to, the following:

1.3.1 General Data Protection Regulation ("GDPR")

1.3.2 CCTV Code of Practice produced by the Information Commissioner

1.3.3 Human Rights Act 1998 [2]

1.3.4 Protection of Freedoms Act 2012 [3]

1.3.5 Surveillance Camera Code of Practice 2013 [4]

- 1.3.6 The Regulation of Investigatory Powers Act 2000 [5]
- 1.3.7 Freedom of Information Act 2000 [6]
- 1.3.8 The Children Act 2004 [7]
- 1.3.9 The Children Act 1989 [8]
- 1.3.10 The Equality Act 2010 [9]

1.4 This policy sets out the position of the School in relation to its use of CCTV.

2. Objectives of the CCTV scheme

The system has been installed by the school with the primary purpose of reducing the threat of crime, protecting the premises and helping to ensure the safety of all of the staff, students and visitors consistent with respect for the individuals' privacy. It is anticipated that the system will do this by:

- Increasing the personal safety of staff students and visitors and reducing the fear of crime
- Deterring those with criminal intent and so protecting the school buildings and their assets
- Assisting in the prevention and detection of crime and the identification, detention and prosecution of offenders
- Protecting members of the public and private property
- Assisting in the management of the school
- Facilitating the identification of any activities/events which might warrant disciplinary proceedings being taken against staff or students and assisting in providing evidence to managers 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 world-wide-web.
- 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.

3. Statement of intent

The CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018 [10] and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice [11].

- The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.
- 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 well-being of the school, together with its visitors.
- Staff are 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 authorisation being obtained from Northamptonshire County Council Authorising Officers for Trading Standards, to take place, as set out in the Regulation of Investigatory Power Act 2000 [5].
- Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. CDs will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. CDs 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.

4. Operation of the system

The Scheme will be administered and managed by the Head teacher or their 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 (SLMT) and the Site Manager during the day and the Site Team out of hours and at weekends. The CCTV controls and hardware devices will only be accessed by SLT and the Site Team. The CCTV system will be operated 24 hours each day, every day of the year.

5. Controls and Hardware

- The Site 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 controls and hardware devices will be strictly limited to the SLT & the Site Team.
- 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 Manager or his deputy and must be accompanied by them 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.

6. Monitoring procedures

The CCTV system will be operated 24 hours each day, every day of the year. A monitor is installed in the main school office and the Head teacher's office to which pictures will be continuously recorded. Recording is undertaken on a rolling 7-day schedule and the disk is overwritten each week. If covert surveillance is planned or has taken place copies of the Authorisation Forms, including any Review, or Cancellation must be returned to the Corporate Monitoring Officer, Northamptonshire County Council.

7. Image storage procedures

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, authorised officers of Northamptonshire County Council for supervisory purposes, authorised demonstration and training.
 - 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 in the log book see Appendix 1.
 - Should a disc be required as evidence, a copy may be released to the Police under the procedures described in this policy. 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 this code. 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. On occasions when a Court requires the release of an original disc this will be produced from the secure evidence disc store, complete in its sealed bag.
 - 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. solicitors) to view or release discs will be referred to the Head teacher. 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. A fee will be charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

8. Breaches of the code (including breaches of security)

Any breach of the Code of Practice by school staff will be initially investigated by the Head teacher, in order for them 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.

9. Assessment of the scheme and code of practice

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

10. Complaints

Any complaints relating to this policy or to the CCTV system operated by the School should be made in accordance with the School's Complaints Policy.

11. 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 Head teacher.

Public information Copies of this Code of Practice will be available to the public from the School Office and the school website

12. References

- [1] gov.uk, "Guide to the General Data Protection Regulation," 25 May 2018. [Online]. Available: <https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation>. [Accessed 12 November 2020].
- [2] legislation.gov.uk, "Human Rights Act 1998," [Online]. Available: <https://www.legislation.gov.uk/ukpga/1998/42/contents>. [Accessed 12 May 2020].
- [3] legislation.gov.uk, "Protection of Freedoms Act 2012," [Online]. Available: <https://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>. [Accessed 22 January 2020].

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- [4] gov.uk, "Surveillance camera code of practice," 19 February 2014. [Online]. Available: <https://www.gov.uk/government/publications/surveillance-camera-code-of-practice>. [Accessed 22 January 2021].
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- [6] legislation.gov.uk, "Freedom of Information Act 2000," [Online]. Available: <https://www.legislation.gov.uk/ukpga/2000/36/contents>. [Accessed 1 July 2020].
- [7] legislation.gov.uk, "Children Act 2004," 2004. [Online]. Available: https://www.legislation.gov.uk/ukpga/2004/31/pdfs/ukpga_20040031_en.pdf. [Accessed 25 August 2020].
- [8] legislation.gov.uk, "Children Act 1989," 1989. [Online]. Available: <https://www.legislation.gov.uk/ukpga/1989/41/contents>. [Accessed 25 August 2020].
- [9] legislation.gov, "Equality Act 2010," 2010. [Online]. Available: <https://www.legislation.gov.uk/ukpga/2010/15/contents>. [Accessed 4 May 2020].
- [10] legislation.gov.uk, "Data Protection Act 2018," 2018. [Online]. Available: <http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>. [Accessed 12 November 2020].
- [11] Information Commissioner Office, "In the picture: A data protection code of practice for surveillance cameras and personal information," [Online]. Available: <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>. [Accessed 13 November 2020].
- [12] Alfred Street Junior School, "Child Protection and Safeguarding Policy".

13. Safeguarding

Safeguarding our children is our priority – see Child Protection and Safeguarding Policy [12]. All concerns must be reported to our Designated Safeguarding leads:
Mrs K O'Connor, Mr C Butler, Mrs S Smith, Mrs W Watts

Appendix 1. Proforma of CCTV Register / Log Book

Alfred Street Junior School

CCTV REGISTER / LOG BOOK

Recording Number	Date and time of incident	Name of authorised person viewing recording and date	Date of recording	Name of authorised person recording released to and date	Date of destruction of digital recording.

Authorised person receiving recording signature

Date

School authorised release of recording signature

Date