



CCTV Procedure

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INTRODUCTION

- 1 The purpose of this Policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at Alderbrook School, hereafter referred to as 'the school'.
- 2 The system comprises of a number of fixed cameras (no audio) located in and around the school site. All cameras are monitored electronically and images are only available to fully trained and authorised staff.
- 3 This Policy follows GDPR and ICO guidelines and complies with relevant legislation.
- 4 The School Policy will be subject to review every 2 years to include consultation as appropriate with interested parties.

OBJECTIVES OF THE CCTV SYSTEM

- To protect students, staff and visitors.
- To increase personal safety and reduce the fear of crime.
- To protect the school buildings and assets.
- Without prejudice, to protect the personal property of pupils, staff and visitors.
- To support the police in preventing and detecting crime.
- To assist in identifying, apprehending and prosecuting offenders.
- To assist in managing the school.

STATEMENT OF INTENT

- 5 The CCTV system will be used in compliance with the requirements of GDPR and the ICO Commissioner's Code of Practice.
- 6 The school will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under GDPR.
- 7 Cameras will be used to monitor activities within the school and its grounds to identify criminal activity actually occurring, anticipated, or perceived. It will be used for the purpose of securing the safety and wellbeing of the pupils, staff and school together with its visitors.
- 8 The system has been designed to deny observation on adjacent private homes, gardens and other areas of private property.
- 9 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.
- 10 Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police.
- 11 Images will never be released to the media for purposes of entertainment.
- 12 The planning and design has endeavoured to ensure that the system 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.

- 13 Warning signs, as required by the Code of Practice of the Information Commissioner, will be clearly visible on the site.

SYSTEM MANAGEMENT

- 14 The system will be administered and managed by the Network Manager who will act as the System Manager, in accordance with the principles and objectives expressed in the policy.
- 15 The day-to-day management will be the responsibility of both the Headteacher and the Designated Safeguarding Lead (DSL) who will act as the Data Controller.
- 16 The system and the data collected will only be available to the Data Controller, the Headteacher, the System Manager and the trained, authorised personnel as listed on the CCTV Trained Personnel Record (kept by the System Manager).
- 17 The CCTV system will be in operation 24 hours each day, every day of the year.
- 18 Recordings will be stored for up to 15 days on a secure server and automatically deleted thereafter. While the CCTV system server is backed up, the data is not.
- 19 The System 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.
- 20 Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.
- 21 The System Manager must satisfy themselves of the identity of any person wishing to view images or access the system and the legitimacy of the request. Where any doubt exists access will be refused.
- 22 Details of ALL Subject Access Request visits and visitors will be recorded in the 'CCTV Subject Access Request Log' including time/date of access and details of images viewed. The 'CCTV Subject Access Request Log' is an electronic form accessible on the school system by all trained and authorised staff.
- 23 Any visit may be immediately curtailed if prevailing operational requirements make this necessary.
- 24 The CCTV system will be assessed annually by the System Manager to ensure all cameras are situated in suitable locations, the 'CCTV Trained Personnel Record' is up to date and that the system in general is set up and working correctly. Details of this check will be recorded in the 'CCTV Annual Assessment'. The assessment will be discussed with all relevant parties for any changes to the system or documents to be actioned.

LIAISON

- 25 Liaison meetings may be held with all bodies involved in the support of the system.

INVESTIGATION PROCEDURE

- 26 Any member of school staff may fill in a 'CCTV Investigation Request' (available from Staff Room or in Standard forms on the School IT System) which must then be handed to one of the Pastoral Managers for investigation.
- 27 A trained and authorised member of staff will conduct the investigation following the CCTV Investigation Procedure.

DOWNLOAD MEDIA PROCEDURES

- 28 In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any download media used to record events from the hard drive must be prepared in accordance with the following procedures: -
- 29 Each download media must be identified by a unique mark.
- 30 Before use, each download media must be cleaned of any previous recording.
- 31 The System Manager will register the date and time of download media insertion, including its reference in the 'CCTV Investigation Form'.
- 32 Download media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a download media 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 and signed by the System Manager, then dated and returned to the evidence store.
- 33 If download media is archived the reference must be noted.
- 34 Images may be viewed by the police for the prevention and detection of crime and by authorised School staff.
- 35 A record will be maintained of the release of any download media to the police or other authorised applicants in the 'CCTV Investigation Form'.
- 36 Viewing of images by the police must be recorded in the 'CCTV Investigation Form'.
- 37 Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the download media (and any images contained thereon) remains the property of the school, and download media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media this will be produced from the secure evidence store, complete in its sealed bag.
- 38 The police may require the school to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until they are needed by the police.
- 39 Applications received from outside bodies (e.g. solicitors) to view or release images will be referred to the Governing Body and Legal representatives.

ASSESSMENT OF THE SYSTEM AND CODE OF PRACTICE

- 40 Performance monitoring, including random operating checks, may be carried out by the Headteacher or the Data Controller.

COMPLAINTS

- 41 Any complaints in relation to the school's CCTV system should be addressed to the Headteacher.

ACCESS BY THE DATA SUBJECT (SUBJECT ACCESS REQUESTS)

- 42 General Data Protection Regulations (GDPR) provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.
- 43 Requests for Data Subject Access should be made to the System Manager for consultation with the Data Controller and Headteacher.
- 44 Any Data Subject Access Request will be responded to within one calendar month.
- 45 Data Subject Access Requests made by Parents on behalf of a student will also require the consent of the student (where the student is 13 or over).

PUBLIC INFORMATION

- 46 Copies of this policy will be available to the public from the school office and on the school web sites.

SUMMARY OF KEY POINTS

- 47 This Policy will be reviewed every two years.
- 48 The CCTV system is owned and operated by Alderbrook School.
- 49 The CCTV system and images are not available to visitors except under circumstances as outlined in this policy.
- 50 Liaison meetings may be held with the police and other bodies if required.
- 51 Downloaded media will be used properly indexed, stored and destroyed after appropriate use, in accordance with GDPR.
- 52 Live Images may only be viewed by authorised School staff and the police.
- 53 Downloaded media required as evidence will be properly recorded witnessed and packaged before copies are released to the police.
- 54 Downloaded media will not be made available to the media for commercial or entertainment purposes.

REFERENCE INFORMATION Data Protection

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