

# CCTV SYSTEM POLICY

## INTRODUCTION

1. The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Ercall Wood Technology College hereafter referred to as 'the school'.
2. The system comprises a number of cameras located around the school site. All cameras are monitored from a Central Control Room and are only available to selected staff.
3. This Code follows Data Protection Act guidelines.
4. The Code of Practice will be subject to review bi-annually.
5. The CCTV system is owned by the school.

## OBJECTIVES OF THE CCTV SCHEME

1. To protect the school buildings and their assets.
2. To increase personal safety and reduce the fear of crime.
3. To support the Police in a bid to deter and detect crime.
4. To assist in identifying, apprehending and prosecuting offenders.
5. To protect members of the public and private property.
6. To assist in managing the school.

## STATEMENT OF INTENT

1. The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.
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. Cameras will be used to monitor activities within the school and its car parks 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.
4. Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.
5. 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 using the school's forms for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.
6. Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. DVD's will never be released to the media for purposes of entertainment.
7. The planning and design has endeavored 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.
8. 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

1. The Scheme will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in the code.
2. The day-to-day management will be the responsibility of both the Senior Leadership Team (SLT), Reception staff and the Site Manager during the day and the Site Team out of hours and at weekends.
3. The Control Room will only be staffed by SLT, Reception staff and the Site Team.
4. The CCTV system will be operated 24 hours each day, every day of the year.
5. Additional cameras are installed in classrooms to monitor behaviour. Whilst not linked to the CCTV system, they are also in place to ensure safety and are subject to the same data protection requirements as the CCTV system.

## CONTROL ROOM

1. Reception staff will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.
2. Unless an immediate response to events is required, staff in the CCTV Control Room must not direct cameras at an individual or a specific group of individuals.
3. The monitors are fitted with privacy screens to prevent unauthorised viewing of images. These must not be removed unless the following conditions are satisfied.
4. Operators must satisfy themselves over the identity of any person requesting to view the CCTV images. Details of all viewings will be endorsed in the log book.
5. The system may generate a certain amount of interest. It is vital that operations are managed with the minimum of disruption.
6. Any visit may be immediately curtailed if prevailing operational requirements make this necessary.
7. If out of hours emergency maintenance arises, the Control Operators must be satisfied of the identity and purpose of contractors before allowing entry.
8. A log book will be maintained which records any viewings.
9. There must always be at least Operator present within the Control Room out of hours and weekends or the Control Room must be locked. During the working day when not manned the room must be kept secured.
10. Other administrative functions will include maintaining DVD's and hard disc space, filing and maintaining occurrence and system maintenance logs.
11. Emergency procedures will be used in appropriate cases to call the Emergency Services.

## LIAISON

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

## MONITORING PROCEDURES

1. Camera surveillance may be maintained at all times.
2. A monitor is installed in the Control Room to which pictures will be continuously recorded.

## VIDEO PROCEDURES

1. In order to maintain and preserve the integrity of the DVD's 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 DVD must be identified by a unique mark.
  - ii. Before using each DVD must be cleaned of any previous recording.
  - iii. The controller shall register the date and time of DVD insert, including DVD reference.
  - iv. A DVD required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence DVD store. If a DVD 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 DVD store.
  - v. If the DVD is archived the reference must be noted.
2. DVD's may be viewed by the Police for the prevention and detection of crime, authorised officers of Telford & Wrekin Council for supervisory purposes, authorised demonstration and training.
3. A record will be maintained of the release of DVD's to the Police or other authorised applicants. A register will be available for this purpose.
4. Viewing of DVD's by the Police must be recorded in writing and in the log book. Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.
5. Should a DVD be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1 (iv) of this Code. DVD's will only be released to the Police on the clear understanding that the DVD remains the property of the school, and both the DVD and information contained on it are to be treated in accordance with this code. The relevant form (A222) must be provided.
6. The school also retains the right to refuse permission for the Police to pass to any other person the DVD or any part of the information contained thereon. On occasions when a Court requires the release of an original DVD this will be produced from the secure evidence DVD store, complete in its sealed bag.
7. The Police may require the school to retain the stored DVD's for possible use as evidence in the future. Such DVD's will be properly indexed and properly and securely stored until they are needed by the Police.
8. Applications received from outside bodies (e.g. solicitors) to view or release DVD'S will be referred to the Headteacher. In these circumstances DVD's 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 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 CODE (INCLUDING BREACHES OF SECURITY)

- 1) 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.
- 2) 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

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

## COMPLAINTS

1. Any complaints about the school's CCTV system should be addressed to the Headteacher.
2. Complaints will be investigated in accordance with Section 9 of this Code.

## ACCESS BY THE DATA SUBJECT

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.
2. 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.
- The Control room will not be manned out of school hours.
- Liaison meetings may be held with the Police and other bodies.
- Recording DVD's will be used properly indexed, stored and destroyed after appropriate use.
- DVD's may only be viewed by Authorised School Officers, Control Room staff and the Police.
- DVD's required as evidence will be properly recorded witnessed and packaged before copies are released to the police.
- DVD's will not be made available to the media for commercial or entertainment.
- DVD's will be disposed of securely by incineration.
- Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the corporate policies and procedures. 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.
- Reviewed March 2045 following audit recommendations.

Reviewed March 2015 following audit recommendations