

CCTV Policy

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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 Perryfields Primary School, hereafter referred to as 'the School'.
- 1.2 The CCTV system is owned and operated by Perryfields Primary School Facilities Management and maintained by Sitewatch Fire and Surveillance Ltd.
- 1.3 The system comprises of fixed 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 school Facilities Management staff together with those directly involved in the security of the school site. Access to view is permitted by the school's Facilities Management to only named school representatives notified by the Head Teacher.
- 1.5 This Policy follows the Data Protection Act 2018.
- 1.6 Operation of the School CCTV Policy will be reviewed annually by the School Governing Body (Health and Safety Governor) and will include consultation with the school's Facilities Management as appropriate.

2. Objectives of the CCTV Scheme

- (a) To protect the School buildings and their assets
- (b) To increase reassurance 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 2008.
- 3.2 The system and all information, documents and recordings obtained and used as data are protected by the Act.
- 3.3 Cameras will be used to monitor activities on the site of the school to identify criminal activity actually occurring, anticipated, or perceived,

and for the purpose of securing the safety and wellbeing of the School buildings, staff pupils and visitors.

- 3.4.1 The Facilities Management 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, facilities management 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 school's Facilities Management, 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's Facilities Management 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 (Site Manager) will check and confirm the efficiency of the system daily (Monday-Friday) and in particular that the equipment is properly recording and that cameras are functional.
- 5.2 The System Administrator (Site Manager) 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) the rights of individuals in relation to their recorded images.
- 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 school's Facilities Management 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 Head Teacher.

6. Liaison

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

7. Monitoring Procedures

- 7.1 Camera surveillance by the site manager will be maintained at all times throughout the day.
- 7.2 Pictures will be continuously recorded.
- 7.3 No covert monitoring will be undertaken until the circumstances have been considered by, and written authorisation obtained from the Corporate Director - People and the Director of Legal and Governance Services.

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 non-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. *Recorded Material Store is the Resources Room.*
- (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 the school's Facilities Management with the prior approval of the Site/Facilities Manager.
- 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's Facilities Management 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 Site/Facilities Manager who will liaise with the Head Teacher. 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.

9. Record Keeping/Incident Logs

The Facilities Management will maintain adequate and comprehensive records relating to the management of the system and incidents. Model documents from the installers/providers of CCTV system (Sitewatch Fire and Security Ltd.) 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. All data images are retained for a period of 30 days.
- 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 adjusting 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 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

A periodic assessment will be undertaken by the Facilities Management to evaluate the effectiveness of the CCTV system.

The outcome of the assessment will be reported to the Site Manager 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 CCTV system should firstly be made, in writing, to the Head Teacher. Complaints will be investigated in accordance with section 11 of this document.

14. Access by the Data Subject

- 14.1 The Data Protection Act 2018 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 for schools maintained by Sandwell Metropolitan Borough Council should be submitted via an enquiry form available on the Council's web page (www.sandwell.gov.uk) using the Search Facility, entering text "Data Protection FAQ's"

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 operation and maintenance of the CCTV system is available from the school Site Manager.

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.

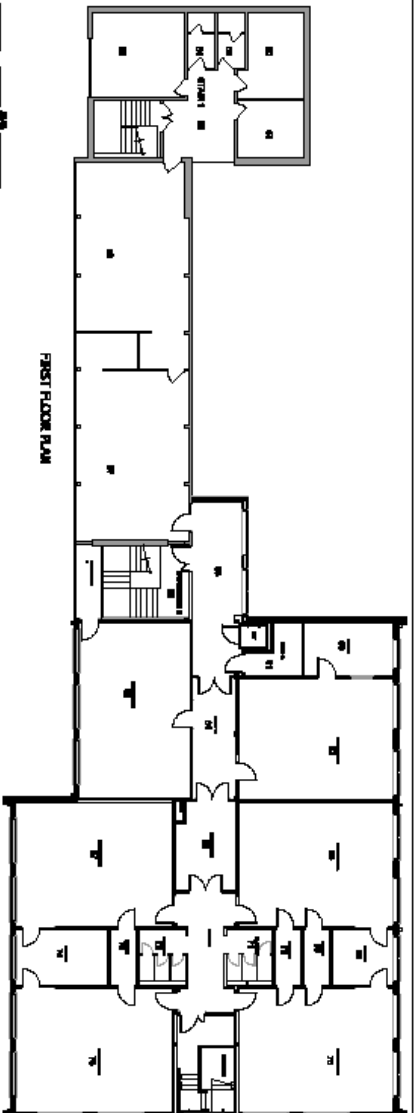
The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

17. Summary of Key Points

- 17.1 The CCTV system is owned and operated by Perryfields Primary School.
- 17.2 The CCTV system will be reviewed annually to evaluate its effectiveness and the Site/Facilities Manager 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 Site/Facilities Manager, Corporate Director - People and the Director of Legal and Governance Services.
- 17.10 Breaches of this policy will be initially investigated by Facilities Management identified in Section 4.1 of this Policy to determine disciplinary action, if necessary, and to make recommendations on how to remedy the breach.

Appendix

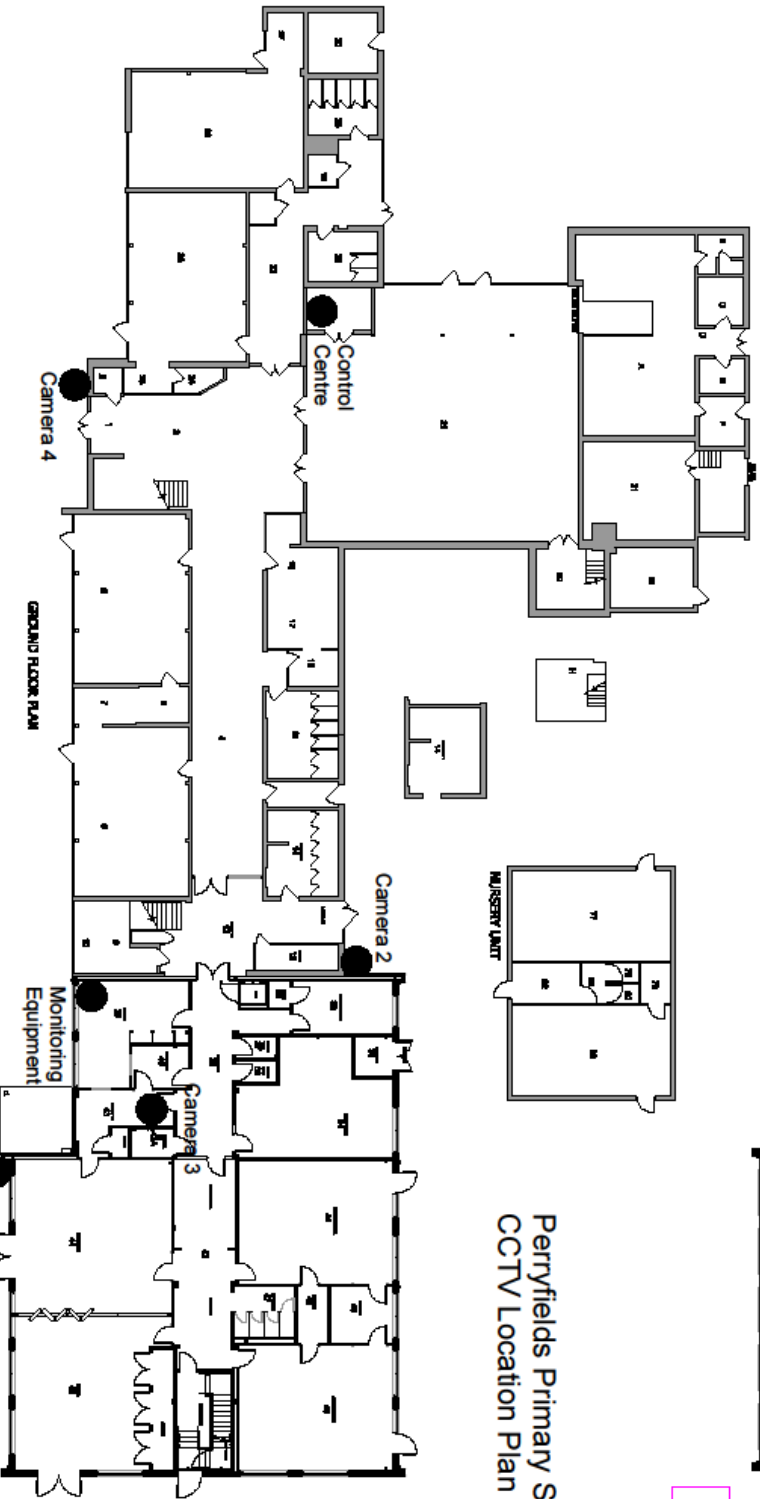
*Plan showing the location of **all** cameras, monitoring equipment and system control centre within the school buildings and on the school site.*



FIRST FLOOR PLAN

ASSEMBLY POINT

Perryfields Primary School
CCTV Location Plan



GROUND FLOOR PLAN

PERRYFIELDS PRIMARY SCHOOL
CD REFERENCE 001 - ASSEMBLY POINTS