



# CCTV Policy & Code of Practice

## 1. Introduction

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) Stokes Wood Primary School.

The CCTV system is owned by the school. The system comprises of a number of fixed cameras located around the school site. All cameras are monitored under restricted access from the school office/CCTV server room and are only available to designated staff.

This Code follows Data Protection Act guidelines.

## 2. Objectives of the CCTV scheme

- To increase personal safety of staff, pupils and visitors and reduce the fear of crime.
- To deter those with criminal intent and to protect the school buildings and assets.
- To assist in the prevention and detection of crime.
- To assist in identifying, apprehending and prosecuting offenders.
- To protect members of the public and private property.
- To facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against staff or pupils and assist in providing evidence to managers and/or to a member of staff or pupil against whom disciplinary or other actions is, or is threatened to be taken.

## 3. Statement of intent

The CCTV Scheme is registered with the Information Commissioner 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.

- 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 its grounds, to identify adverse activity occurring, anticipated or perceived, and for the purpose of securing the safety and well-being of the school's pupils and staff, together with its visitors.
- Cameras are not focused on private homes, 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 media for use in the investigation of a specific crime and with the written authority of the Police. 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.

#### **4. Operation of the system**

The CCTV system will be administered and managed by the school in accordance with the values and objectives expressed in the code. The day-to-day management will be the delegated responsibility of the Finance/IT Officer during the day. Viewing of recorded images must take place in a restricted area with controlled access. The CCTV system will be operated 24 hours each day, every day of the year, recording all activity. All operators and others with access to images must be aware of the access procedures that are in place.

#### **5. Control and Liaison**

The system will be periodically checked to ensure 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 IT Officer, Business Manager, Admin Officer, Site Manager, Deputy, Assistant Headteacher and Headteacher.

#### **6. Monitoring procedures**

Camera surveillance may be maintained at all times and footage continuously recorded and held on system memory. Data will not be held for longer than is necessary and will be routinely deleted after 30 days.

#### **7. Image storage procedures**

In order to maintain and preserve the integrity of the media devices 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:

1. Recordings are initially stored on the hard drive of either the School Business Manager's, Finance Officer's, Site Manager's pc then if necessary they are then saved to a disc.
2. The person responsible for recording will log the date and time of the disc recording.
3. All discs required for evidential purposes must be sealed, witnessed, signed by the person responsible for recording, dated and stored in the safe. 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 responsible member of staff, dated and returned to the safe.

Recordings may be viewed by the Police for the prevention and detection of crime. A record will be maintained of the release of the recording to the Police or other authorised applicants. A register will be available for this purpose.

Viewing of recordings by the Police or any external individual must be recorded in writing and entered in the register. Following an appropriate formal request from the Police, recordings will only be released to the Police on the clear understanding that the data remains the property of the school, and both the recording 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 recording or any part of the information contained thereon. On

occasions when a Court requires the release of an original recording this will be produced from the safe, complete in its sealed bag. The Police may require the school to retain the recording for possible use as evidence in the future. Such recordings 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 recordings will be referred to the Headteacher. In these circumstances, recordings 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. This must be provided within one month of receiving the request. If the decision is taken not to release the images, then the image in question should be held and not destroyed until all legal avenues have been exhausted.

## **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 Headteacher, in order for the Headteacher to take the appropriate disciplinary action. Complaints will be dealt with in accordance with the ICO Code of Practice.

## **9. Assessment of the scheme and code of practice**

Performance monitoring, including random operating checks, may be carried out by the Finance/IT Officer or School Business Manager.

## **10. Complaints**

Any complaints about the school's CCTV system should be addressed to the Headteacher. Complaints will be investigated in accordance with the ICO Code of Practice.

## **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.

Data Subject Access Requests should be made in writing to the Head Teacher. The request should provide as much information as possible to enable the school to find the images including date, time and location. If the Data Subject is unknown to the school, then a photograph of the individual and/or a description of what they were wearing at the time they believe they were caught on the system may be requested in order to aid identification.

## **12. Public information**

Copies of this policy are available on the school website.

Approved by Governors:

Date: June 2023

Review Date: April 2024