

CCTV Policy

Vaughan Primary School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

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Introduction

Vaughan Primary School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings and grounds in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.

The CCTV system is owned and operated by the school, the deployment of which is determined by the school's Senior Leadership Team (SLT). The system comprises a number of fixed and dome cameras. The system does not currently have sound recording capability.

The CCTV is monitored centrally from the school offices by the administrative staff and the Site Supervisors office. The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and the school community.

The school's CCTV scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings is covered by the Data Protection Act 2018. This policy outlines the school's use of CCTV and how it complies with the Act.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the school's data controller in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

1. Objectives of the CCTV scheme

The objectives of having a CCTV scheme are:

- To protect the school buildings and assets of the school
- To increase personal safety and reduce the fear of crime
- To support the police in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders
- To assist in managing the operation of the school

2. 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. Vaughan Primary 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, 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 wellbeing of the school, together with its visitors.

Staff have been 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 using the school's forms for directed surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Files will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Discs will never be released to the media for purposes of entertainment.

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. 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.

3. Operation of the system

The scheme will be administered and managed by the Headteacher, 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 Team (SLT) and the Site Supervisor during the day.

The CCTV system will be operational 24 hours each day, every day of the year. The system was installed by RVTV and is also maintained and serviced by them. The school CCTV system presently has 16 cameras.

The Site Supervisor 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 recorder will be strictly limited to the Headteacher, Senior Leadership Team and the Site Supervisor.

4. Monitoring procedures

Camera surveillance may be maintained at all times. A monitor and data recorder is installed within each of the reception offices to which pictures will be continuously recorded.

The school may in exceptional circumstances set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

If covert surveillance is planned, it can only be undertaken by the police or the Local Authority using the appropriate authorisation forms. In these circumstances authorisation must be

obtained from a member of the Senior Leadership Team and covert monitoring must cease following completion of an investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles.

5. Storage and Retention of CCTV images

In order to maintain and preserve the integrity of the discs 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:

- Each disc must be identified by a unique mark.
- Before using, each disc must be cleaned of any previous recording.
- The controller must register the date and time of disc insert, including disc reference.
- A disc (recording) required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence 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 store.
- If the disc is archived the reference must be noted.

Recorded data is stored for a maximum of 30 days before being over-written. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. All retained data will be stored securely.

6. Restricted access to CCTV images

Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

Materials of knowledge secured as a result of CCTV will not be used for any commercial purpose. Information transferred to CD/DVD (or other appropriate media) will only be used for the investigation of a specific crime or incident.

7. Access to and Disclosure of Images to Third Parties

There will be no disclosure of recorded data to third parties' other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators). Any such requests should be made in writing to the Headteacher.

Recordings may be viewed by the police for the prevention and detection of crime and authorised officers of the Local Authority / County Council. A record will be maintained of the release of recordings to the police or other authorised applicants. A register will be available for this purpose.

Viewing of recordings 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 2018. Should a recording be required as evidence, a copy may be released to the police under the procedures described in the above bullet points of section 8 of this Code. Recordings will only be released to the police on the clear understanding that the recording 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 secure evidence 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 (for example solicitors) to view or release recordings will be referred to the Headteacher. 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.

The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

8. Complaints

Any complaints about the school's CCTV system should be addressed in the first instance to the Headteacher and they will be investigated in accordance with Section 9 of the CCTV Code of Practice.

Any breach of the Code of Practice by school staff will be initially investigated by the Headteacher, 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. 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.

All requests should be made in writing to the school's Data Protection Officer. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

The school will respond to requests within 30 calendar days of receiving the written request.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation

10. Further Information

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018