

Grand Avenue Primary and Nursery School

CCTV System Policy

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Grand Avenue School. The system comprises a number of fixed cameras located around the school site. All cameras are monitored within the school by the headteacher and the Senior Leadership Team.

This Code seeks to comply with the Data Protection Act 1998 and the Protection of Freedoms Act 2012, and has regard to the Code of Practice for Surveillance Cameras and Personal Information issued by the Information Commissioner in 2014 and the Surveillance Camera Code of Practice issued by the Home Office in 2013.

The CCTV system is owned by the school and the school is the controller for the purposes of the Data Protection Act 1998. The CCTV system has been notified to the Information Commissioner under the Data Protection Act 1998. The school will treat recordings of individuals and associated information obtained using the CCTV system as personal data under that legislation.

The headteacher is responsible for the operation of the system, under the oversight of the governing body.

OBJECTIVES OF THE CCTV SCHEME

The CCTV system will be used to monitor activities within the common areas, school grounds and play areas in order to identify potentially criminal or otherwise inappropriate activity, to help determine the cause of accidents or injuries, and for the purpose of securing the safety and wellbeing of members of the school community and visitors. The school is satisfied, based on its past experience of dealing with issues of the type outlined above, that there is a pressing need for such monitoring.

STATEMENT OF INTENT

Grand Avenue Primary School respects the right to privacy of members of the school community and will seek to implement this policy in a proportionate and accountable way that protects the safety and wellbeing of all members of that community and visitors.

Data obtained using the CCTV system will not be used for any commercial purpose. Such data will only be released to the media for use in the investigation of a specific crime and with the written authority of the police and after taking appropriate advice where the headteacher considers it necessary to do so. Such data will never be released to the media for purposes of entertainment.

The planning and design of the CCTV system has endeavoured to ensure that the system will give maximum effectiveness and efficiency but it is not possible to guarantee that it will cover or detect every single incident taking place in the areas of coverage.

OPERATION OF THE SYSTEM

The registered data controller is the school. The system will be administered and managed by the headteacher, in accordance with this policy.

The day-to-day management will be the responsibility of both the Senior Leadership Team and the school Business Manager and Office Manager . The Business Manager will be able to access the system if necessary during the summer holidays.

The school administrative staff will check and confirm the efficiency of the system on a regular basis and in particular that the equipment is properly recording and that cameras are functional.

The CCTV system covers common areas of the school. There are no cameras in the toilets or changing areas.

Signs indicating the operation of the system are located on the front gate.

There are two monitors, one situated in the school office and the other in the headteacher's room. Neither is visible to unauthorised users. Pictures are continuously recorded to the headteacher's monitor. The hard drive recording system is in the school office and access to the recorded images is limited to the SLT, the Business Manager and the administrative team for purposes of system checking. Administrative functions include maintaining DVDs and hard disc space, filing and maintaining occurrence and system maintenance logs.

The system is password protected. The system is not accessible via, or connected to, the internet.

DVD PROCEDURES AND QUALITY OF IMAGES

Images are retained on a hard disc drive for a period of 28 days. Unless required for specific purposes, images will be deleted after this time. Copies, in the form of DVDs, may be made for investigation purposes.

Checks will be made to ensure the accuracy of any features such as the location of the camera and/or date and time reference. Where the time/date etc are found to be out of sync with the current time/date, the operators will take such remedial action as is contained in the operations manual to correct the error. A note of such changes will be recorded in the maintenance log.

Access to the recorded images is restricted to the headteacher, who will decide whether to allow requests for access.

Viewing of the recorded images should take place in a restricted area, for example, in the headteacher's office. Other employees should not be allowed to have access to that area when a viewing is taking place. A record will be kept of these viewings and of the persons present.

In order to maintain and preserve the integrity of the DVDs 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 DVD must be identified by a unique mark.

- Before use, each DVD must be cleaned of any previous recording.
- The headteacher shall register the date and time of DVD insert, including DVD reference on a log provided for that purpose.
- A DVD required for evidential purposes must be sealed, witnessed, signed, 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 tape store.
- If the DVD is archived the reference must be noted.

DVDs may be viewed by the police for the prevention and detection of crime. A record will be made in the log book of the release of DVDs to the police or other authorised applicants.

Viewing of DVDs 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. DVDs will only be released to the police on the clear understanding that they remain the property of the school, and both the DVD and information contained on it are to be treated in accordance with this policy. 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 on it. On occasions when a Court requires the release of an original DVD this will be produced from the secure evidence DVD store, in a sealed bag.

The police may require the school to retain the stored DVDs for possible use as evidence in the future. Such DVDs 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 DVDs will be referred to the headteacher. In these circumstances DVDs will only be released where it is first clearly established that such release is compatible with the relevant legislation. A fee can be charged in such circumstances: £10 for subject access requests, a sum not exceeding the cost of materials in other cases.

PROCEDURE RELATING TO SCHOOL INCIDENTS

When an incident occurs in school involving injury or improper behaviour, an incident record will be completed and parents informed. The incident form reports the date, place and time of the incident.

If the pupil or parent disputes the report the headteacher or authorised member of the SLT may view the incident and make a DVD of the relevant footage. The time of viewing and copying will be recorded in the appropriate log and signed.

The DVD may then be shown to the parent/carer and/or pupil as part of an interview process to help determine the facts of the matter. The CCTV data relating to the incident will not be deleted until the issue has been resolved.

In the event of a serious allegation made against another pupil or a member of staff, a DVD of footage from the relevant date and time will immediately be made and retained to ensure that there is a record to help establish the facts.

Requests from individuals to access personal data will be dealt with in accordance with the policy set out below.

BREACHES OF THIS POLICY

Any suspected breach of this policy by school staff will be initially investigated by the headteacher. Where appropriate, a suspected breach of this policy may be considered by a panel of governors. Breach of this policy may lead to disciplinary action against those involved.

COMPLAINTS

Any complaints about the school's CCTV system should be addressed to the headteacher. Complaints will be investigated in accordance with practice outlined under breaches of the policy.

SUBJECT ACCESS REQUESTS

The Data Protection Act 1998 provides Data Subjects (individuals to whom "personal data" relates) with a right to data held about themselves.

In accordance with Section 7 of the Data Protection Act 1998 (Subject Access), an individual who believes that their image has been captured by this scheme is entitled to make a written request to the data controller. Upon payment of the current fee, and the supply of essential information, a systems search will be conducted and subject to certain conditions, the individual will be allowed access to the personal data held (The current maximum fee is £10.00 and may be reviewed)

All subject access requests should be referred in the first instance to the headteacher who represents the school in its capacity as data controller.

All staff involved in operating the equipment must be able to recognise a request for access to recorded images by data subjects and how such requests are to be dealt with.

Data subjects should be provided with a standard subject access request form, a copy of this form is attached at appendix A, which:

- a. Indicates the information required in order to locate the images requested;*
- b. Indicates the information required in order to identify the person making the request;*
- c. Indicates the fee that will be charged for carrying out the search for the images requested.*

The above form will also establish whether the individual would be satisfied with merely viewing the images recorded. The form will also indicate that the response will be provided promptly and in any event within 28 days of receipt.

Prior to any authorised disclosure, the headteacher will need to determine whether the images of another "third party" individual features in the personal data being applied for and whether the release of any such third party images would be appropriate under the relevant legislation. If third party images are involved the headteacher may take appropriate and proportionate steps to address this, such as arranging for the third party images to be, cropped, disguised or blurred.

If the headteacher decides that a subject access request from an individual is not to be complied with, the following should be documented:

- a. The identity of the individual making the request;*

- b. The date of the request;*
- c. The reason for refusing to supply the images requested;*
- d. The name and signature of the person making the decision.*

REQUESTS UNDER THE FREEDOM OF INFORMATION ACT 2000

The Freedom of Information Act 2000 provides for a right to request information that a public body such as the school holds, including, in principle, recordings obtained using CCTV. The headteacher will consider any such request under the terms of the Freedom of Information Act 2000, including any potentially relevant exemptions.

Data will be deleted after 28 days. However, if the CCTV data is held at the time of the request, it should not be deleted until the relevant incident is closed, even if such data falls due for deletion under the retention guidelines.

PUBLIC INFORMATION

Copies of this Code of Practice will be available to the public via the school website and the headteacher.

Appendix A

Grand Avenue Primary and Nursery school

FORM TO REQUEST ACCESS TO CCTV IMAGES – FEE £10.00

NAME:

ADDRESS:

DATE OF BIRTH:

PROOF OF IDENTITY PROVIDED :

TELEPHONE NUMBER:

DATE IMAGE RECORDED:

TIME IMAGE RECORDED:

LOCATION IMAGE RECORDED:

**WOULD YOU BE CONTENT WITH VIEWING THE RELEVANT IMAGES, OR
ARE YOU SEEKING A PERMANENT COPY?**

SIGNATURE:

DATE:

To carry out a search for the images, a fee of £10.00 will be charged.

Please complete the above form and attach a £10.00 cheque made payable to Grand Avenue Primary and Nursery School

The headteacher will consider the request and respond within 28 days