CCTV Policy

Ffederasiwn Ysgolion **Llanidloes** Schools Federation

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Policy Author	Daniel Owen / Elen Chennetier
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1.0 Background

1.1 Llanidloes Schools Federation uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime, monitoring the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent loss or damage to school property.

1.2 CCTV surveillance at the schools is intended for the purposes of:

- protecting the school buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, pupils and visitors;
- preventing bullying;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the Police in a bid to deter and detect crime;
- assisting in identifying, apprehending, and prosecuting offenders; and ensuring that the schools' rules are respected so that the schools can be properly managed.

1.3 The system comprises of six fixed cameras at the primary school. The system comprises of forty nine fixed cameras at the secondary school.

1.4 The CCTV system is owned and operated by the schools and the deployment is determined by the schools' leadership teams.

1.5 The CCTV is monitored centrally from the office at the primary school. The CCTV is monitored centrally from the office and GOFAL unit at the secondary school.

1.6 This policy outlines the schools' use of CCTV and how it complies with relevant data protection legislation.

1.7 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 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.

1.8 The schools comply with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use. The code of practice is attached at Appendix 2.

1.9 The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy, for example, CCTV will not be used for monitoring employee performance.

1.10 CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the schools, including Dignity at Work Policy, Codes of Practice for dealing with complaints of Bullying and Harassment and

Sexual Harassment and other relevant policies, including the provisions set down in equality and other educational and related legislation.

2.0 Justification for Use of CCTV

2.1 The use of CCTV to control the perimeter of the school buildings for security purposes has been deemed to be justified by the leadership teams and governors. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation or of antisocial behaviour.

2.2 CCTV systems will not be used to monitor normal teacher and student classroom activity in the schools.

3.0 Data Protection Impact Assessments

3.1 Where new CCTV systems or cameras are to be installed, the schools will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This may involve the need for consultation with staff, parents and local residents.

4.0 Location of Cameras

4.1 Cameras will be sited so that they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated.

4.2 The schools will ensure that the location of equipment is carefully considered to ensure that images captured comply with relevant Data Protection legislation. The schools will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

4.3 CCTV will not be used in classrooms.

4.4 Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. Llanidloes Schools Federation has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.

4.5 Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

4.6 CCTV Video Monitoring and Recording of Public Areas may include the following:

- protection of schools' buildings and property: the buildings' perimeters, entrances and exits, lobbies and corridors, special storage areas, office locations, receiving areas for goods and services;
- monitoring of Access Control Systems: monitoring and recording restricted access areas at entrances to buildings and other areas;

- verification of security alarms: intrusion alarms, exit door controls, external alarms;
- criminal investigations (carried out by police): robbery, burglary and theft surveillance.

5.0 Covert Surveillance

5.1 Llanidloes Schools Federation will not engage in covert surveillance.

6.0 Notification

6.1 A copy of this CCTV Policy will be provided on request to staff, students, parents and visitors to the school and will be made available on the school website.

6.2 Adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation.

6.3 Adequate signage will also be prominently displayed at the entrances to schools' properties. Signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location. Appropriate locations for signage will include:

- at entrances to premises i.e. external doors, school gates
- reception areas
- at or close to each internal camera

7.0 Storage and Retention

7.1 The images captured by the CCTV system will be retained for a maximum of 63 days, except where the image identifies an issue and is retained specifically in the context of an investigation or prosecution of that issue.

7.2 The images/recordings will be stored in a secure environment with a log of access kept.

7.3 Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Headteachers. The Headteachers may delegate the administration of the CCTV System to another staff member.

7.4 In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

7.5 Files, tapes and DVDs will be stored in a secure environment with a log of access to tapes kept. Access will be restricted to authorised personnel. Similar measures will be employed when using disk storage, with automatic logs of access to the images created.

8.0 Access

8.1 Recorded footage and the monitoring equipment will be securely stored in restricted areas. Unauthorised access to those areas will not be permitted at any time. The areas will be locked when not occupied by authorised personnel. A log of access to footage will be maintained.

8.2 Access to the CCTV system and stored images will be restricted to authorised personnel only.

8.3 When accessing images two authorised members of staff must be present. A written record of access will be made. Records of access will be kept.

8.4 A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

8.5 Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

8.6 In relevant circumstances, CCTV footage may be accessed:

- by the police where Llanidloes Schools Federation (or its agents) are required by law to make a report regarding the commission of a suspected crime; or
- following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on school property, or
- by the HSE and/or any other statutory body charged with child safeguarding; or
- to assist the headteachers in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- by data subjects (or their legal representatives), pursuant to a Subject Access Request (SAR) or Rights of Access request, or
- by individuals (or their legal representatives) subject to a court order, or
- by the schools' insurance companies where the insurance company requires same in order to pursue a claim for damage done to the insured property.

9.0 Subject Access Requests (SAR)

9.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

9.2 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.

9.3 The schools will respond to requests within 30 calendar days of receiving the request in line with the schools' right of access policy.

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

9.5 A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

9.6 In giving a person a copy of their data, the schools provide a still/series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

9.7 Where footage contains images relating to third parties, the schools will take appropriate steps to mask and protect the identities of those individuals.

10.0 Complaints

10.1 Complaints and enquiries about the operation of CCTV within the schools should be directed to the headteacher in the first instance.

11.0 Staff Training

11.1 Staff authorised to access the CCTV system will be trained to comply with this policy. Staff will understand that all information relating to the CCTV images must be handled securely.

11.2 Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.

11.3 Staff misuse of surveillance system information will lead to disciplinary proceedings.

12.0 Responsibilities

12.1 The headteachers (or nominated deputies) will:

- ensure that the use of CCTV systems is implemented in accordance with the policy set down by Llanidloes Schools Federation;
- oversee and co-ordinate the use of CCTV monitoring for safety and security purposes of the school;
- ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy;
- ensure that the CCTV monitoring at Llanidloes Schools Federation is consistent with the highest standards and protections;
- review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy;
- maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system;
- ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally;

- give consideration to both students and staff feedback and complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment;
- ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place;
- ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of a "Reasonable Expectation of Privacy";
- ensure that monitoring footage are stored in a secure place with access by authorised personnel only;
- ensure that images recorded on tapes, DVDs and digital recordings are stored for a period of no longer than 30 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil);
- ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy. When it is deemed necessary to use this facility Appendix 1 will be completed;
- ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics;
- ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.

Appendix 1

CCTV Monitoring Log

Anyone looking at CCTV must have a second person with them and must complete this form.

Date	Time	Name of 1st individual	Name of 2nd individual	Reason for viewing

Appendix 2

The schools comply with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use. All staff who use the CCTV are advised to read the code of practice, and this CCTV Policy.

https://ico.org.uk/media/1542/cctv-code-of-practice.pdf