



# Paget Primary School

2023-24

CCTV POLICY

Adopted / Approved by Governing Body	
Next Review Date	

# **Paget Primary School CCTV Policy**

## **Introduction**

The purpose of this policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system at Paget Primary School hereafter referred to as 'the school'.

The system comprises several fixed and dome cameras located around the school site. All cameras are monitored from a central control point in the reception office and ICT control room, plus off-site out of hours surveillance (monitoring only) is carried out by BSM and selected Senior Staff with the use of mobile applications.

This policy follows Data Protection Act guidelines and will be subject to review annually to include consultation as appropriate with interested parties.

The CCTV system is owned by the school.

## **2. Objectives of the CCTV scheme**

- To protect the school buildings and their assets
- 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 protect members of the public and private property
- To assist in managing the school.

## **3. Statement of intent**

The CCTV Scheme is registered with the Information Commissioner under the terms of the General Data Protection Regulation 2018 and will seek to comply with the requirements both of the GDPR 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, its car parks and other public areas to identify criminal activity 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. CCTV footage will only be released to the media for use in the

investigation of a specific crime and with the written authority of the police. CCTV footage 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 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 the Senior Leadership Team (SLT), BSM and ICT Team.

Monitoring of the CCTV will be by authorised personnel from the BSM and Administration Team during the day. The CCTV system will be operated 24 hours each day, every day of the year.

#### **5. Control Room**

ICT will check and confirm the efficiency of the system weekly and in particular that the equipment is properly recording and that cameras are functional.

Access to the CCTV/ICT Control Room will be strictly limited to the SLT, ICT and BSM Teams. Unless an immediate response to events is required, staff in the CCTV/ICT Control Room must not direct cameras at an individual or a specific group of individuals.

BSM and ICT must satisfy themselves over the identity of any other visitors to the Control Room and the purpose of the visit. Where any doubt exists access will be refused.

The system may generate a certain amount of interest. It is vital that operations are managed with the minimum of disruption. Visitors must first obtain permission from the BSM, or his deputy and must be accompanied by him throughout the visit. Any visit may be immediately curtailed if prevailing operational requirements make this necessary.

If out of hours emergency maintenance arises, the BSM must be satisfied of the identity and purpose of contractors before allowing entry. Full details of visitors including time/data of entry and exit will be recorded.

During the working day when the Control Room is not manned the room must be kept secured.

Other administrative functions will include maintaining recordings and hard disc space, filing and maintaining occurrence and system maintenance logs.

Emergency procedures will be used in appropriate cases to call the Emergency Services.

## **6. Liaison**

Liaison meetings may be held with all bodies involved in the support of the system.

## **7. Monitoring procedures**

Camera surveillance is viewed/monitored at all times from the Administration Office. A monitor is installed in the ICT Control Room to which pictures will be continuously recorded.

If covert surveillance is planned, it can only be undertaken by the police or the Council using the appropriate authorisation forms.

## **8. Video recording/disc procedures**

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.
- ICT 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 ICT, 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 ICT, dated and returned to the evidence store.
- If the disc is archived the reference must be noted.

Recordings may be viewed by the police for the prevention and detection of crime and authorised officers of the 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/others must be made within 30 days of the event, and can only be actioned under the GDPR 2018.** Please note: Current recorded footage is only available up to 30 days at a time and will not be kept beyond this (unless specifically requested). Footage on the hard drive is overwritten after a period of 30 days.

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' footage 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. An administrative fee may be charged in some circumstances (not exceeding the cost of materials where repeat request are made).

## **9. 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 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.

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

Performance monitoring, including random operating checks, may be carried out by the BSM.

## **11. Complaints**

Any complaints about the school's CCTV system should be addressed to the Headteacher. Complaints will be investigated in accordance with Section 9 of this Code.

## **12. Access by the data subject**

The GDPR provides data subjects (individuals to whom 'personal data' relate) with a right to data held about themselves, including those obtained by CCTV. Requests for data subject access should be made in writing and be addressed to the Headteacher.

## **13. Public information**

Copies of this Code of Practice will be available to the public on the School's website.

## **Summary of Key Points**

- This Code of Practice will be reviewed annually.
- The CCTV system is owned and operated by the school.
- The Control room will not be manned out of school hours.
- The Control Room is not open to visitors
- Liaison meetings may be held with the police and other bodies.
- Downloaded recordings will be properly indexed, stored and destroyed after appropriate use.
- Recordings may only be viewed by authorised School officers, Control Room staff and the police.
- Recordings required as evidence will be properly recorded witnessed and packaged before copies are released to the police.
- Recordings will not be made available to the media for commercial or entertainment.
- Footage will be disposed of securely.
- Any breaches of this code will be investigated by the Headteacher. An independent investigation will be carried out for serious breaches.
- Breaches of the code and remedies will be reported to the Headteacher.