



Clifford Holroyde Specialist SEN College

CCTV POLICY

1. Introduction

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

The system comprises a number of fixed and dome cameras located around the school site. Camera recordings are stored on equipment which is located in a secure location. Access to the system is only available to nominated senior staff. Access is by secure password held by Headteacher and site manager only.

This policy follows Data Protection Act guidelines and has been updated to comply with new GDPR regulations and will be subject to review.

The CCTV system is owned by the school and is serviced annually under contract.

2. Objectives of the CCTV scheme:

The lawful basis (legal right) for using CCTV at school to process data under GDPR includes:

- 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 will be registered with the Information Commissioner under the terms of the Data Protection Act 1998 as well as GDPR 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 is protected by the Act/Regulations.

Cameras will be used to monitor activities within the school and 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 well being 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 Powers Act 2000.* (The Council's Compliance Unit based at Westfields is able to give advice if required)

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 Scheme will be administered and managed by Mrs Pepa, Headteacher in accordance with the principles and objectives expressed in the code.

The day-to-day management will be the responsibility of Mr Peach, site Manager.

4.3 The CCTV system will be operated 24 hours each day, every day of the year.

5. Location of CCTV control system

Mr Peach 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 will be strictly limited to Headteacher and site manager.

Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.

Control operators 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.

If out of hours emergency maintenance arises, the site manager must be satisfied of the identity and purpose of contractors before allowing entry.

Full details of visitors including time/date of entry and exit will be recorded.

When not manned the facility must be kept secured.

Other administrative functions will include the maintenance of recordings eg: video tapes and hard disc space, filing, and system maintenance logs.

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

6. Monitoring Procedures

Camera surveillance may be maintained at all times.

A monitor is installed in the Control facility to which pictures will be continuously recorded.

If covert surveillance is planned or has taken place copies of the appropriate Authorisation Forms, including any Review must be completed and retained. Please contact the DPO at Liverpool City Council for further guidance.

7. Recording Procedure

In order to maintain and preserve the integrity of the tapes/disc/recordings etc 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:

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

Records may be viewed by the Police for the prevention and detection of crime.

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 records by the Police must be noted in writing and in the log book. Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.

Should a record be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8 of this Code. Records will only be released to the Police on the clear understanding that the record remains the property of the school, and both the record 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 record or any part of the information contained thereon. On occasions when a Court requires the release of an original tape this will be produced from the secure evidence record store, complete in its sealed bag.

The Police may require the school to retain the stored records for possible use as evidence in the future. Such records will be properly indexed and properly and securely stored until they are needed by the Police.

Applications received from outside bodies (e.g. solicitors/insurance) to view or release tapes will be referred to the Headteacher. In these circumstances records will only be

released where satisfactory documentary evidence is produced showing that they are required for legal proceedings.

8. Right to Access Data

Under GDPR, a subject access request can be made to view personal data. The request doesn't have to be in writing and no charge will be made.

It is appropriate to consider refusing a request where a release of recording will disclose data of another individual who has not given consent. Please refer to guidance from ICO as well as the Schools GDPR/Data Protection policy.

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 DPO in order for Headteacher to consider 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 Business Manager/DPO.

11. Complaints

Any complaints about the school's CCTV system should be addressed to the Headteacher.

12. Public Information

Copies of this Policy document will be available to the public from the School website, www.clifford-holroyde.co.uk School Office and the Headteacher.

13. Summary of Key Points

This Policy document will be reviewed every two years.

The CCTV system is owned and operated by the school.

The Control system is not open to visitors except by prior arrangement and good reason.

Any recordings will be used properly, indexed, stored and destroyed after appropriate use.

Recordings may only be viewed by Headteacher/Site Manager appropriate e.g Authorised School Officers 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 purposes.

Recordings will be disposed of securely by incineration.

Any breaches of this Policy will be investigated by DPO/Headteacher official eg: the Headteacher.) An independent investigation will be carried out for serious breaches. Breaches of the Policy and remedies will be reported to the Headteacher

Date: June 2018