

Attenborough Learning Trust

Closed Circuit Television (CCTV) Policy

CCTV Policy

This procedure operates in all schools within the Attenborough Learning Trust. For each school in the trust Highfields Primary School should be read as the individual school.

Highfields Primary School uses external and internal Closed-Circuit Television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.

Legality

There are two important points within the CCTV Code of Practice 2008 which are basic points of law that must be adhered to.

CCTV Signs

CCTV signs are erected around the building within prominent locations that clearly identifies that CCTV recording is in operation. Signs are located in the car park, at the main entrance (reception) and outside the building entrances.

Registering the CCTV System

The Attenborough Learning Trust is registered with the Information Commissioner.

The Data Protection Act 2018 and UK GDPR

The Data Protection Act 2018 relates to data processing of all types. The definition of data under the Act is “Personal data” means any information relating to an identified or identifiable living individual. It requires the person to be identified by a number of means, which can include photographic or video footage.

The definition of Processing is much wider in its scope than the previous legislation) “Processing”, in relation to information, means an operation or set of operations which is performed on information, or on sets of information, such as—

- a collection, recording, organisation, structuring or storage,
- b adaptation or alteration,
- c retrieval, consultation or use,
- d disclosure by transmission, dissemination or otherwise making available,
- e alignment or combination, or
- f restriction, erasure or destruction

Data in the case of CCTV recordings is in the form of recorded images of individuals that can be identified from these images.

Having regard for these definitions, it will be recognised that the use of CCTV for surveillance purposes is encompassed by the requirements of the Data Protection Act.

Objectives

Operators of the system have access to a clear statement of the objectives of the system and responsibilities of those involved in its operation and management and to restrict unauthorised persons from gaining access to recorded images.

Confidentiality

Operators of the system are aware of the need for confidentiality and that recorded information must be kept secure and available only to those directly connected with achieving the objectives of the system.

Copy Recordings

Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation, or a valid Subject Access Request. Copies are only issued by the system manager to those directly connected with achieving the objectives of the system. Appendix A can be utilised to assist in issuing recorded images to authorised agents such as the police.

Information Sharing (Section 115, Crime and Disorder Act 1998)

The Crime and Disorder Act creates a power to share information from the System Owner/Operator to the Police and between the Police Forces, Police Authorities, Probation Committees, Local Authorities and Health Authorities. The Data Protection Act 2018 also enables law enforcement agencies and statutory bodies to have access to information to enable them to prevent, detect and prosecute crimes, or to safeguard vulnerable adults and children.

General access to CCTV footage

It will not be common practice to release CCTV footage unless satisfactory evidence for a secure legal basis can be provided. This is authorised within Section 115, Crime and Disorder Act 1998.

In appropriate circumstances, Highfields Primary School may allow authorised personnel to view footage where the above purposes are considered. Highfields Primary School will maintain a record of all disclosures. All requests for access should be made in writing (using form Appendix A) to the system manager/ headteacher. Any disclosure will be done in line with UK GDPR and Data Protection. The school/academy cannot guarantee disclosure of footage when made under a Subject Access Request due to:

- lack of technical resources available in order to blur or redact the footage
- the release of footage would prejudice an ongoing investigation
- other identifiable individuals have not consented.

Retention

The archive period of recordings is no longer than is necessary to achieve the objectives of the system. The archive period is 30 days.

Erasure

Digital recorders are set up in such a way as to overwrite old footage with new footage after the retention period has been reached.

Covert Recording

Because fairness requires that we install signs to make individuals aware that they are entering an area where their images are recorded, it follows that failure to provide signs is a breach of the Data Protection Act.

However, we are able to rely on an exemption of the Data Protection Act which states that personal data processed for reasons of prevention and detection of crime and apprehension and prosecution of offenders are exempt. Providing that the following criteria are met:

We have assessed that if we had to inform individuals that recording was taking place it would prejudice our objective.

We have reasonable cause to suspect specific criminal activity is taking place.

That covert processing is only carried out for a limited and reasonable period of time and relates to the specific suspected criminal activity.

We have decided in principle that we wish to adopt covert recording. We have a clearly documented procedure which sets out how we determine whether the use of covert recording is appropriate in an individual case. A confidential appendix regarding our decision that covert recording is appropriate is lodged with the headteacher.

Use of Recordings

The CCTV recordings may be used for:

- Prevention and detection of crimes, in the school and its environs
- Pupil behaviour management, discipline and exclusions
- Staff disciplinary and associated processes and appeals.

When using CCTV footage for any of the above purposes it shall be permissible to access and enable relevant third parties to see the footage using a suitably secure device or media, subject to notification within Appendix A below.

Traceability and Record Keeping

Any recorded images that are copied to a third-party data source, such as a video tape, CD or DVD recordings, are identified by a unique serial number indelibly marked on the body of the media. The unique identity of the recording is obviously compromised if it is applied only to the outer cover. Recordings must be logged and traceable throughout their life within the system. If images are copied to a third-party media, this is documented in Appendix A.

A routine audit is undertaken at regular intervals to ensure that recorded images are actually recording and that no fault exists with the recording system. The system is maintained by a maintenance company. Original recordings are only found:

- a Within the recognised secure storage system
- b Operational in the recording device
- c Secured in an evidence bag

Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation or a valid subject access request. Copies are only issued by the system manager to those directly connected with achieving the objectives of the system.

Time and Date Stamping

- The correct time and date is overlaid on the recorded image.
- These date and time settings are checked and corrected as part of the routine maintenance visits.

Secure Storage of Recordings

The recordings and recording/processing equipment are only accessible to those directly concerned with achieving the objectives of the system.

Recordings and Recording/Processing equipment are located in a secured lockable enclosure accessible only to authorised persons. A register of authorised users is maintained at all times.

CODE OF PRACTICE POLICY STATEMENT

This code of practice policy statement relates to the Closed Circuit Television System (CCTV) installed within Highfields Primary School

The system manager is the headteacher of Highfields Primary School who has the overall responsibility of ensuring the management of the systems recorded images, maintenance and training of persons authorised to use the system and who has responsibility as Data Controller for the CCTV system.

Other authorised personnel trained to operate the system are the Premises Officer, the School Business Manager and the Administration Officer.

The objectives of the system are to assist in the detection of crime, provide evidence of crime and to deter those who have criminal intent:

- to give confidence to staff and visitors that they are in a secure environment
- to provide management information relating to Health & Safety matters
- to support pupil behaviour and discipline management.
- to record actions of staff, pupils and school visitors that may be used for disciplinary or monitoring purposes

System

The system comprises of the following primary items:

Recording media type	Digital Recorder DVR recording system		
The system records images from	Colour cameras		
Monitors			
Fixed cameras			
Moveable cameras			
Covert cameras			
CCTV signs			

The operating manuals relating to the specific items of equipment have been compiled and are located in the respective CCTV Server Room. It is the responsibility of **the headteacher** to ensure that all authorised staff are aware of the function of the system and capable of operating the system.

General Principles

The principles detailed in the CCTV Code of Practice 2008 are observed in the operation and management of the system.

APPENDIX A



Subject Access Request for CCTV footage from Highfields Primary School

Please complete all of section 1. A member of staff from Highfields Primary School will complete section 2.

Section 1

Date of footage	
Start time of footage	
End time of footage	
Cameras of required footage	
Name of person requesting footage	
Reason for requesting footage	
Copy of footage has been recorded to DVD/USB	
Serial number of media disk if applicable	

The above information and associated CCTV footage has been compiled on behalf of Highfields Primary School. The footage detail above has been compiled in accordance with the CCTV code of practice 2008. It is the recipient's responsibility to store and dispose of the recorded media in accordance with the CCTV Code of Practice 2008 and the recipients take full responsibility for the safe keeping of the footage as detailed above. A copy of the codes can be obtained by visiting www.ico.gov.uk.

Highfields Primary School will maintain a log of access requests detailing who the requests have been made by.

Section 2

Issuer of the above footage		
Name	Signature	Date
Copy of footage has been recorded to: DVD <input type="checkbox"/> USB <input type="checkbox"/> <i>Tick one box</i>		
Serial number of media disk if applicable:		

Recipient/ Person requesting footage

Name	Signature	Date
Address:		
Identification provided:		