

HOLMWOOD SCHOOL

CCTV POLICY



Approved by Full Governing Body – 30.10.17

INTRODUCTION

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system within Holmwood School and Space for Sports and Arts.

The CCTV system that is owned and used by the school comprises of a number of fixed cameras located around the school site. All cameras are monitored within the school by designated members of staff.

The implementation of this Policy and Code of Practice is in line with the Data Protection Act guidelines.

The Code of Practice will be subject to review biennially, to include consultation as appropriate with interested parties.

PURPOSES OF HAVING CCTV

These are the following reasons why the school own and use a CCTV system:

- To safeguard vulnerable SEN pupils.
- To protect the school buildings and their assets.
- To increase the personal safety of pupils, staff and visitors and reduce the fear of crime.
- To protect members of the public and private property.
- To assist in the Health and Safety management of the school.

It is important to note that CCTV is not in place to watch individual pupils or members of staff undertaking their day to day activities or to monitor their performance, unless there is cause for concern on conduct which could impact on the health and safety of other pupils and members of staff.

STATEMENT OF INTENT

The CCTV scheme will seek to comply with the requirements both of the Data Protection Act and 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 under the Act.

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 safety and wellbeing of the school community, together with visitors.

Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.

Materials or knowledge as a result of CCTV will not be used for any commercial purpose. DVDs will never be released to the media for the purpose of entertainment.

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

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.

OPERATION OF THE SYSTEM

The CCTV System will be administered and managed overall by the Headteacher.

The day to day management will be the responsibility of both the Senior Management Team and the designated person responsible for the system.

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

There will be a weekly check of the system to confirm efficiency and to ensure that the equipment is properly recording and the cameras are functional.

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

Full details of visitors including time and date of entry and exit to school buildings during school hours will be recorded.

The operating system will be kept secure.

Administrative functions will include maintaining DVDs and hard disc space, filing and maintaining occurrence and system maintenance logs (see Appendices).

MONITORING PROCEDURES

Camera surveillance will be operational at all times.

One monitor is installed in the Reception Office room to which pictures will be continuously recorded and saved to the server.

Designated members of staff will only be able to access 28 days worth of stored footage.

DVD PROCEDURES

In order to 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 will be strictly adhered to:

- Each DVD will be identified with a unique mark.
- A new DVD will be used each time.
- A DVD required for evidential purposes must be sealed, witnessed and signed by the Headteacher, dated and stored in a separate, secure location.
- All DVDs released to the Police will be logged.
- Applications received by outside bodies e.g. Solicitors will be referred to the Headteacher, in these circumstances DVDs will only be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request or a court order. A fee will be charged of £10 to cover materials.

BREACHES OF CODE OF PRACTICE

Any breach of the Code of Practice by school staff will be immediately investigated by the Headteacher in order to take the appropriate disciplinary action.

In serious breaches of the code, advice will be taken from the Local Area Designated Officer in accordance with the school's Safeguarding procedures.

COMPLAINTS

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

INDIVIDUAL SUBJECT ACCESS

In accordance with the Data Protection Act individual subjects to whom personal data relates have the right to the data held about themselves, including CCTV footage.

VISITORS

Visitors wishing to gain access to the CCTV system for maintenance, repairs etc. or to view Data as part of an investigation i.e. Police, HMRC, UKBA, DWP, PO investigations etc. or members of the public in connection with a Subject Access request **MUST** log on and off site in the CCTV Register.

THE DATA PROTECTION ACT 1998

The Data Protection Act 1998 relates to data processing of all types. The definition of data under the Act includes information which is being processed by equipment operating automatically in response to instructions given for that purpose or is recorded with the intention that it should be processed by means of such equipment.

The definition of Processing is much wider in its scope than previous legislation and includes obtaining, recording or holding information or data, or carrying out any operation or set of operations on the data, organisation of the data by transmission, dissemination, or otherwise making available, alignment, combination, blocking, 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.

The Data Protection Act principles which the Council, as a data controller, must comply with (unless a specific exemption applies) are set out in Schedule 1 of the Act and may be summarised as follows:-

1. Personal data shall be processed fairly and lawfully.
2. Personal data shall be obtained only for one or more specified and lawful purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and where necessary, kept up to date.
5. Personal data shall not be kept for longer than is necessary.
6. Personal data shall be processed in accordance with the rights of data subjects under the act.
7. Appropriate measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or damage to it.
8. Personal data shall not be transferred to a country outside the European Economic Area without adequate safeguards.

The office of the Chief Executive and Security Services Manager has responsibility to ensure that the Council fully complies with the Data Protection Act with regard to CCTV operations.

CCTV OPERATOR LOG

To be completed every time a person accesses the CCTV

DATE	TIME	NAME OF OPERATOR	REASON FOR USE	SIGNATURE

CCTV VISITOR LOG

DATE	TIME	NAME AND ADDRESS	REASON	OPERATOR	SIGNATURE OF VISITOR

CCTV REPAIRS AND MAINTENANCE LOG

DATE OF FAULT	NATURE OF FAULT	DATE REPAIRED	BY WHOM	COMPANY NAME	OPERATURE SIGNATURE