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## Holywell Primary School

### CCTV Policy

<b>Status:</b>	Non-Statutory
<b>Approval Body:</b>	Governing Body
<b>Review Frequency:</b>	3 Years
<b>Last Review:</b>	June 2022
<b>Next Review:</b>	Summer 2025

# Holywell Primary School



## CCTV Policy

### 1. Introduction

- 1.1 The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Holywell School.
- 1.2 The system comprises 27 fixed cameras located around the school, augmented by security lighting. The CCTV incident recording system records continuously. Real time viewing of events around the school is afforded by monitors located in the Headteacher's office, Caretaker's office and school office. The video recorder located in the Headteacher's office acts as the Control Monitor for the system and provides the following viewing facilities:
  - Manual switching between cameras
  - Single screen simultaneous viewing of all cameras.
  - Spot monitoring by a designated camera

The monitors located in the Headteacher's office, Caretaker's office and school office provide a single view from cameras 1 – 27.

- 1.3 The school's CCTV system is registered with the Information Commissioner's Office and is operated within the guidelines of the Data Protection Act.
- 1.4 The CCTV system is owned and operated by the school.

### 2. Objectives of the CCTV scheme

The objectives of the school's CCTV scheme are:

- To increase personal safety for pupils, staff, parents and visitors when entering, moving around and leaving the school.
- To enable the office/nursery to see the main school gates when open.
- To protect the school buildings and assets.
- To 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 assist in managing the school.

### 3. Statement of Intent

The school's CCTV scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and the school will seek to comply with the requirements of the Data Protection Act and the Information 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.
- Use the CCTV system to monitor activities within the school site and its car park to secure the safety and well being of pupils, staff, parents and visitors.
- Use the CCTV system to identify criminal activity occurring, anticipated or perceived.
- Ensure that materials or knowledge secured as a result of CCTV will not be used for any commercial purposes.
- Ensure that recordings will only be released to the media for use in the investigation of a specific crime and only with the authority of the Police.
- Ensure that warning signs as required by the Code of Practice of the Information Commissioner have been placed at access routes to areas covered by the school CCTV.

While the CCTV scheme is designed to provide adequate effectiveness to meet the objectives set out in para 2 of this policy it is however limited by the constraints of the school's budget. It is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

#### **4. Operation of the system**

- 4.1 The scheme will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in the Code.
- 4.2 The day to day operation of the system will be the responsibility of the Site Manager who shall act, on behalf of the Headteacher, as the controller.
- 4.3 The CCTV system will operate 24 hours each day, every day of the year.

#### **5. Checking of the System**

- 5.1 The Site Manager will check the functioning of the system on a weekly basis.
- 5.2 Access to the CCTV recording and playback facilities is strictly limited to the Site Manager, Headteacher and Senior Leadership Team.
- 5.3 Only personnel employed by the school's appointed CCTV maintenance contractor may undertake routine maintenance or repairs to the system.

#### **6. Monitoring Procedures**

- 6.1 Camera surveillance will be maintained at all times.
- 6.2 The design of the CCTV system has no provision for undertaking covert surveillance.

#### **7. Recording Procedures**

- 7.1 The CCTV video recorder only records and retains images of 'incidents'. The recording system is movement activated and therefore not capable of differentiating between the movement of animals and trees and criminal activity when recording an incident. Images of incidents are recorded onto a hard drive and under normal circumstances the recordings are retained on the disk for approximately five weeks. During this period, incident recordings can be reviewed and if necessary copied to a CD or sent via email as a digital recording for permanent retention as evidence of criminal activity etc.
- 7.2 It should be noted that the period that the incident recording is retained on the video hard drive may be substantially reduced should the CCTV recording system be activated by excessive movement of trees and shrubs as a result of prolonged storm conditions.
- 7.3 Incident recordings may be viewed by the police for the prevention and detection of crime.
- 7.4 Viewing of recordings by the police, or other authorised applicants, must be entered in the register/log book. Requests by the police can only be actioned under section 29 of the Data Protection Act 2018.
- 7.5 A register/log book will be maintained of the release of any incident digital recordings to the police or other authorised applicants.
- 7.6 Should a recording be required as evidence, a digital copy may be released to the police in accordance with the following procedures:
- Each recording must be identified by a unique mark or saved in a file that is encrypted and only accessible to the Headteacher/Senior Leadership Team.
  - The controller shall register the date and time of the recording.
  - A recording required for evidential purposes must either be sent via the Headteacher's email address (which will be encrypted) or sealed, witnessed, signed by the controller, dated and stored in the school safe.
  - Recordings will only be released to the police on the clear understanding that the footage remains the property of the school, and both the recording and information contained on it are to be treated in accordance with this policy and the Data Protection Act 2018.
- 7.7 The school 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.
- The police may require the school to retain the stored recordings for possible use as evidence in the future. Such recordings will be properly registered and securely stored in the school safe until they are needed by the police.
  - Applications received from outside bodies (e.g. solicitors) to view or release recordings will be referred to the Headteacher. In these circumstances recordings will normally be released where satisfactory documentation is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee can be charged in such circumstances: £25 for subject access requests; a sum not exceeding the cost of materials in other cases.

## **8. Breaches of the Code**

- 8.1 Any breaches of this CCTV Policy by school staff will be initially investigated by the Headteacher and the appropriate disciplinary action taken.
- 8.2 Any serious breach of the Policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

## **9. Assessment of the scheme**

- 9.1 Regular performance monitoring of the system, including random checks, will be carried out by the Site Manager and the school's IT Technician.
- 9.2 The school has appointed a CCTV specialist contractor to undertake maintenance inspections to ensure the system is operating at maximum performance.

## **10. Complaints**

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

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

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relates) with a right of access to inspect data held about themselves, including that obtained by CCTV.

## **12. Public information**

Copies of this CCTV System Policy will be available to the public from the Headteacher.

## **13. Summary of key points**

- This CCTV System Policy will be reviewed every three years.
- The CCTV system is owned and operated by the school.
- Any recordings must be used properly, stored securely and destroyed after appropriate use.
- Recordings may only be viewed by authorised school staff and the police. Viewing by any other persons, (e.g. parents and members of the public etc.) will at the discretion of the Headteacher (or in his/her absence by the Deputy Headteacher).
- CD Recordings required as evidence will be properly registered, witnessed and packaged before copies are released to the police.
- Recordings will not be made available to the media for commercial or entertainment purposes.
- CD Recordings that are no longer required to be retained are to be destroyed by

