HUNSLEY PRIMARY

CCTV Code of Practice – V1

Effective Date:	**16-11-2021**
Date Reviewed:	**-**
Contact Officer:	**Lucy Hudson, Headteacher**

1. Definitions for the Purposes of this Code

Personal data – any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly.

Data controller – the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data

System Manager – the person with day to day responsibility for making decisions about how the cameras are used and the processing of images captured, including maintaining the relevant code of practice.

Overt surveillance - means any use of surveillance for which authority does not fall under the Regulation of Investigatory Powers Act (RIPA) 2000.

2. Identified Key Risk Factors

The Education Alliance as data controller has identified the following risk factors.

Fraud / Theft / Wilful Damage / Breaches of Security / Use of Violence / Instances of Crime

3. Purpose of the System

- Prevent, investigate and detect crime
- Help reduce the fear of crime
- Assist with the apprehension and prosecution of offenders
- Enhance the safety of employees and the public
- To safeguard vulnerable adults and children

- Provide evidential material for court or committee proceedings
- Reduce incidents of public disorder and anti-social behaviour
- Evidence in investigations of gross misconduct (including protecting employees from allegations)
- Protect property
- Process Subject Access Requests

4. Camera Locations and Associated Coverage Linked to Perceived Risk Factors.

Ref	Location	Line of Site	Fixing	Risk indicator
1	External – above front Main Office window, and left of the Main Entrance to school	Front of site from cycle shed to the Hall gate	Patrolling left to right	Theft / Damage / Violence / Safeguarding / Breach of security / Instances of Crime
2	External – on the Main Pedestrian access gate – intercom camera	The main access gate only – face-height for intercom Live feed only	Static	Safeguarding / Breaches of security
3	External – above the Hall window to the rear of the site	Rear of site from Hall to end of rear walkway	Patrolling left to right	Theft / Damage / Violence / Safeguarding / Breach of security Instances of Crime
4	Internal – Main entrance inner foyer above the right hand-side of the Server room door	Front foyer and inner doorway	Static	Theft / Damage/ Safeguarding / Breach of security
5	Internal – Side entrance foyer above the left hand-side of the double access doors to the east end of the building	Foyer only	Static	Damage / Safeguarding / Breach of security
6	External – on the secondary Pedestrian access gate – intercom camera	The main access gate only – face-height for intercom Live feed only	Static	Safeguarding / Breaches of security

5. Control of Access to System and Images

The viewing of live time imagery captured on overt cameras that duplicate what is in general public view is acceptable. However, caution and discretion is advised at all times. Where possible, display screens should be placed in locations away from public view.

Cameras are monitored through a terminal which is located in the Server Room in a locked cabinet and the recording equipment is located in the same locked cabinet and kept with screens switched off.

Screens should be switched off at all times unless the camera is to be used for the purpose for which it was designed; this will avoid 'unintentional' viewing of unrelated imagery.

The Headteacher shall be the system manager and will hold the keys, administrator's password and the right to allocate passwords to users of the system.

The named persons with associated levels of access rights to surveillance system are:

Ref	Staff Name, Job Role	Access Level
1	Headteacher	Full
2	School Administrator (designated staff member)	Full
3	Caretaker	Full
4	Designated Deputy for the Headteacher	Full

All authorised users of the system must be trained in the use of the system and must have read the Code of Practice and procedures in relation to its use. Once training is complete, each authorised user will sign a training register to verify that they understand how to use the system. The training register is kept in the Compliance Folder on the W-drive and training is recorded in the school Management Information System, SIMS.

6. Camera System Checks and Maintenance

A joint half termly assessment of the system will be carried out by an Administrator and Caretaker together to ensure that all cameras are receiving an image (basic functionality) and that the time and date shown on the images are correct. All instances of camera malfunction must be reported as soon as possible, to the Caretaker and designated agency responsible for service and repair.

Image capture quality must also be tested on a monthly basis. All of the functioning cameras are to be selected (on a rotational basis) and the images produced tested for clarity (in case of the need for production of images for use, in cases of criminal prosecution).

Records of the tests are to be recorded in Total Risk Manager (TRM), the school's online health, safety and compliance recording system.

7. Retention of Recorded Images

Images recorded onto the hard drive of the CCTV systems shall be retained for a period of no more than 30 days (unless images are being used for an ongoing investigation).

At the end of the 30 day period, images are overwritten automatically (by earliest date of recording first) or can be saved by an authorised named person if an investigation is ongoing.

This action must be recorded in the system log book, detailing date period, by whom and why the images are being retained.

Any images that may have been saved must be deleted after a period of 6 calendar months of retention, unless a specific request has been received stating otherwise.

8. Reference Tables in Use

Not in use

9. Disclosure of Images

Any request by an outside organisation or individual (SAR), for access to recorded or real time CCTV images must be passed to the schools Data Protection Officer for logging and authorisation.

Should the request be a 'simple', unobtrusive request, this may be dealt with on site by any of the identified 4 members of staff with permission to view the footage.

Imagery must be reviewed by the authorised named person, taking into account any possible third party inclusion in images. Every effort should be made to protect third party privacy.

Should the authorised named person feel that any third party would not have their basic right to privacy infringed, they may offer the individual/organisation requesting sight of the imagery, the opportunity to 'view' the recorded data.

Should the individual then go on to request a copy of the imagery, this must be referred to the school's Data Protection Officer for authorisation. The appropriate request form must be completed and a record made within the system log book.

Should the school receive a request for CCTV footage from the Police the following Police requests do not require prior authorisation. However the member of staff dealing with the request must be confident that there is a need to share the information and a log must be kept:

- Police requests relating to an immediate danger to the public/staff.
- Requests which relate to crimes the school has reported to the Police.

Once completed, details must be logged as with any other request.

If the request cannot be dealt with immediately, copied images must be held securely on the Administrative side of the school W-drive, under 'Compliance', as outlined in section 6.

10. Signage

Appropriate signage shall be displayed in the following:

- Main Reception Entrance – Office Window (referring to the camera above the main entrance
- Main Internal Foyer (referring to the internal foyer camera)
- Main External Pedestrian Gates (2 gates)

11. References

The Education Alliance CCTV Policy
Human Rights Act 1998
Data Protection Act 2018
General Data Protection Regulation
Regulation of Investigatory Powers Act 2000
Freedom of Information Act 2000
Protection of Freedoms Act 2012
Surveillance Camera Code

ICO CCTV Code of Practice - https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf