

NEWPORT GIRLS' HIGH SCHOOL ACADEMY TRUST



CCTV POLICY

Policy written by:	Headteacher
Policy written/reviewed:	January 2018
Next review due:	Reviewed: January 2020 & January 2022 Next review due: January 2024

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

The system comprises a number of fixed and dome cameras located around the school site. All cameras are monitored from a central control point and are only available to selected staff on the Administrative Network. This policy follows Data Protection Act guidelines and will be subject to review annually to include consultation as appropriate with interested parties.

The CCTV system is owned by the school.

Objectives of the CCTV scheme

- 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.

Statement of intent

The CCTV policy 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 are protected by the Act.

Cameras will be used to monitor activities within the school to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school, staff, students and visitors.

Static cameras do not 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 Power Act 2000.

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.

Operation of the system

The scheme will be managed by the Headteacher, in accordance with the principles and objectives expressed in the code. The day-to-day management will be the responsibility of both the Senior Leadership Team (SLT) and the Network Manager.

Access to the software to view the recordings will only be made available to the Headteacher (or Deputy in the Head's absence) and the Network Manager. The Headteacher may use discretion to ask other colleagues to help identify students in the event of an incident or crime occurring. The CCTV system will be operated 24 hours each day, every day of the year. Recordings will be kept on the hard-drive of the system for approximately 28 days.

Communication Room

- The Network Manager 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 to the CCTV Comms. Room will be strictly limited to the SLT, Caretaking staff (electrical switches) and the Network Manager. Visitors and other contractors wishing to enter the Comms. Room will be subject to particular arrangement as outlined below. Operators must satisfy themselves over the identity of any other visitors to the Comms. Room and the purpose of the visit. Where any doubt exists access will be refused.
- If out of hours emergency maintenance arises, the Caretaker on call must be satisfied of the identity and purpose of contractors before allowing them entry. A visitors book will be maintained in the Comms. Room. Full details of visitors including time/date of entry and exit will be recorded.
- When not manned, the room will be kept secured.
- Emergency procedures will be used in appropriate cases to call the Emergency Services.

Liaison

Liaison meetings may be held with all bodies involved in the support of the system.

Monitoring procedures

Camera surveillance will be maintained at all times. A monitor is installed in the Comms. Room to which pictures will be continuously recorded.

Video disc procedures

On occasions when footage needs to be exported, this will occur using DVD discs or MP4 download (dependent upon filesize). The following points will be observed when using DVD discs:

- Each disc must be identified by a unique mark.
- Before using, each disc must be cleaned of any previous recording.
- The controller must register the date and time of disc insert, including disc reference.
- A disc (recording) required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence store.
- If a disc 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 store. If the disc is archived the reference must be noted.
- Recordings 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 recordings by the police must be recorded 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 recording be required as evidence, a copy may be released to the police under the procedures described in the above bullet points of section 8 of this Code.
- Recordings will only be released to the police on the clear understanding that the recording remains the property of the school, and both the recording 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 recording or any part of the information contained thereon.
- On occasions when a Court requires the release of an original recording, this will be produced from the secure evidence store, complete in a sealed bag.
- The police may require the school to retain the stored discs for possible use as evidence in the future. Such discs will be properly indexed and properly and securely stored until they are needed by the police.

Any MP4 downloads will be stored in a secure area of the school network, accessible only to the Headteacher (or nominated representative) and Network Manager. Applications received from outside bodies (for example solicitors) to view or release recordings will be referred to the Headteacher. In these circumstances, recordings will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a court order.

Breaches of the code (including breaches of security)

Any breach of the Code of Practice will be initially investigated by the Headteacher, in order for them to take the appropriate disciplinary action.

Any serious breach of the Code of Practice will be immediately investigated and, if necessary, an independent investigation carried out to make recommendations on how to remedy the breach.

Assessment of the scheme and code of practice

Performance monitoring, including random operating checks, may be carried out by the Headteacher.

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 the code" section above.

Access by the data subject

The Data Protection Act provides data subjects (individuals to whom 'personal data' relate) with a right to data held about themselves, including those obtained by CCTV. Requests for data subject access at a particular point in time should be made formally in writing to the Headteacher with the reasons for requesting this.

Public information

Copies of this Code of Practice will be available to the public from the School Office and the Headteacher.

Summary of Key Points

- This Code of Practice and Policy will be reviewed at least every two years.
- The CCTV system is owned and operated by the school.
- The Communications Room is not open to visitors except by prior arrangement and good reason.
- Liaison meetings may be held with the police and other bodies.
- Recordings will be properly indexed, stored and destroyed after appropriate use.
- Recordings may only be viewed school officers, those with access to the Comms. Room 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.
- Any breaches of this code will be investigated by the Headteacher. An independent investigation may be carried out for serious breaches.
- Breaches of the code and remedies will be reported to the Headteacher.