



The
Boleyn
Trust



New City Primary School CCTV POLICY CODE OF PRACTICE

September 2019

Policy Creation and Review

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CCTV POLICY AND CODE OF PRACTICE

Introduction

The purpose of this Policy and Code of Practice is to ensure that New City Primary School uses CCTV responsibly and with effective safeguards. The intention is:

1. To create a safer working environment for staff and pupils in the School.
2. To protect property belonging to the School, its pupils and staff.
3. To provide evidence in support of any internal or external enquiry, disciplinary proceedings or prosecution, especially if associated with the security of the School site and members of the School community, criminal activity committed on School property, or the misuse of School property or equipment.

Cameras are placed around entrances to the School, to avoid infringement of privacy. They should not face into School buildings. Cameras transmit images to dedicated CCTV servers, from where they can be viewed on a real time basis in the School Office. Recordings are made onto the hard disks of the CCTV servers for replay in the event of an incident.

This Policy and Code of Practice sets out the appropriate actions and procedures, which must be followed to comply with the Data Protection Act in respect of the use of CCTV surveillance systems managed by the School.

1. To inform all who come onto the School site that CCTV is in use.
2. To keep images from CCTV secure and controlled by authorised personnel.
3. To maintain all CCTV equipment in working order.
4. To provide retention of images within the stated purpose only.
5. To state the manner and means of destroying stored images.
6. To prevent access by unauthorised individuals or third parties.

Responsibilities

The system is operated by the School and is in use all year round. The School Business Manager has overall responsibility for the implementation and use of the system. The School Technician ensures all equipment is maintained and in a suitable condition. The Senior Leaders will interrogate the system and its images. Operation of the system is restricted to those named above.

Staff who use the CCTV system have the following responsibilities:

1. To uphold the arrangements of this Policy and Code of Practice.
2. To handle images and data securely and responsibly, within the aims of the Policy and Code of Practice.
3. To be aware that they could be committing a criminal offence if they misuse CCTV images.
4. To uphold the recorded procedure for subject access requests.
5. To report any breach of procedure to the School Business Manager.
6. To attend training / refresher sessions as required.

Siting the Cameras

Prior to any camera installation the School Technician and Senior Leaders will ensure that the installation complies with the Data Protection Act 2018 and the CCTV Policy and Code of Practice. It is essential that the location of the equipment is carefully considered; the way in which images are captured will need to comply with the Data Protection Act 2018. All camera locations are visible to public and staff. Signs have been erected at the main entrance to notify all those who enter that they are entering an area that is covered by CCTV cameras.

Processing live and near live CCTV Images

The following procedures concern the viewing and use of the CCTV images in response to a live or on-going event in the School.

1. The School Office staff may directly view the live feeds from any camera during their working hours.
2. In response to an on-going event the above staff may view recently recorded footage to ascertain facts necessary to respond to the event.
3. No recordings or copies of historic or live images or footage are permitted; if this is necessary then the following policy for accessing historic images must be followed.

Processing historic CCTV Images

The following procedures concerning the use and retention of recordings should be followed in order to provide an acceptable level of security and accountability, and to ensure the acceptance of recordings in support of criminal proceedings.

1. Recordings for most cameras are retained on the CCTV server for up to 90 days and are then overwritten.
2. If an incident occurs and it is thought that the CCTV system has some evidence on it, in general, permission must be sought from two authorised Senior Leaders, or the Data Protection Officer before the recordings are viewed. Authorised School Officers in this regard are the Head Teacher, Deputy Head Teachers and School Business Manager
3. Requests must be recorded on the CCTV POLICE ACCESS REQUEST AND RECORDING form (Appendix B).
4. Once a valid request has been made the School Office will process the footage and generate a copy of the recording.
5. All viewings of recordings must be logged in the CCTV Log held in the School Office.
6. If any evidence is found, the copy of the relevant part of the recordings will be stored on a common digital media. A CCTV recording form should then be completed and placed with the digital media in a sealed envelope, and handed to the Head Teacher as soon as possible.
7. The Head Teacher, or a nominated deputy, should mark each item of digital media with a unique reference number.
8. All digital media will be securely stored in the School Office until they are passed to a Police Officer, or no longer needed.
9. The IT Technician is responsible for destroying all digital copies when they are no longer needed for evidence. Digital copies should be destroyed, by appropriate means for the specific media and disposing of them in the confidential waste container. Each disposal should be noted in the CCTV Log (Appendix C).
10. The Head Teacher, or a nominated deputy, is responsible for ensuring that the CCTV log is kept up to date.

Access to and Disclosure of Images to Third Parties

Access to, and disclosure of, images is restricted and carefully controlled to ensure privacy of individuals, but also to ensure that the continuity of evidence remains intact should the images be required for evidential purposes.

If staff need access to images for the purpose of maintaining the CCTV system. Individuals requesting access to images from a CCTV recording should be asked to complete a CCTV Subject access Request Form (Appendix A). Any request by a third party to view a CCTV recording **must be approved** by the Data Protection Officer in consultation with the School Business Manager, who will determine whether disclosure is appropriate and whether there is a duty of care to protect the images of any third parties. Disclosure requests should be addressed to the Data Protection Officer. Images will be provided within 30 calendar days of receiving a request.

Once this has been actioned the CCTV disc details should be noted in the CCTV Log (Appendix C) held in the School Office. Any digital media that is requested by the Police in connection with a criminal enquiry will be released against an Officer's signature and the completion of CCTV Police Access Request and Recording

Register (Appendix B), after authorisation by the School Business Manager in connection with staff matters and by the Senior Leader in respect of pupils.

On no account may CCTV images or recordings be viewed by any unauthorised person, or removed from the School Office without the specific approval of the School Business Manager, Senior Leader, or the Data Protection Officer. Staff will be informed that any misuse or unauthorised access of live CCTV images or recordings will be considered as a serious disciplinary matter.

If the School is asked to retain a recording for evidential purposes, the Head Teacher will take possession and securely store the relevant digital media for as long as is required, which would normally be until one month after the finalisation of any court proceedings.

Complaints Procedure

Any individual who has concerns about the CCTV system or the control of it at New City Primary School is requested to write to the School Business Manager or the Data Protection Officer outlining the reason for the complaint. The School will accept electronic (e-mail) correspondence.

Information and Training

A copy of this Policy and Code of Practice will be published on the School's website.

The Senior Leaders, School Technician and the School Business Managers will be trained in the practical use of the CCTV system. The Senior Leaders, School Technician and the School Business will be issued with a copy of the Information Commissioner's CCTV Code of Practice.

Implementation, Monitoring and Review of this Policy

This policy will take effect from 1st September 2018. The H&S Officer has overall responsibility for implementing and monitoring this policy, which will be reviewed on a regular basis following its implementation (at least annually) and additionally whenever there are relevant changes in legislation or to our working practices.



New City Primary School

CCTV SUBJECT ACCESS REQUEST FORM

Under the terms of the Data Protection Act 2018 an individual has the right to request a copy of any personal information held about him/her by School, whether it is in hard copy, electronic, or CCTV. Should you wish to exercise your right in requesting disclosure of your data recorded on CCTV please complete this form, providing as much information as possible.

Please note that any request by a third party to view CCTV images must be approved by the Data Protection Officer, who will determine whether disclosure is appropriate and whether there is a duty of care to protect the images of any third parties. Images will be provided within 30 calendar days of receiving a request.

1. PERSONAL DETAILS	
Applicant's full name:	
Applicant's postal address:	
Applicant's email address:	
2. INFORMATION REQUIRED	
To help us find the CCTV data you require, please complete the following section.	
Location/position of CCTV camera:	
Date image taken:	Time image taken:
Brief description of the applicant's appearance and likely activities captured by CCTV: (A recent photograph may also be required to assist identification of the relevant images.)	
Please give any other information that might assist us in finding the information required:	

Do you require a hard copy of the image or would "viewing" the images be sufficient?

Hard copy

Viewing

3. DECLARATION

Delete as applicable.

- I confirm that all of the information I have provided is correct and that I am the Data Subject.
- I confirm that I am acting on behalf of the Data Subject and have attached proof of my authority to do so.

Name:

Postal address:

Email address:

Signed:

Date:

4. PROOF OF IDENTITY

If you are applying on someone else's behalf, please attach documented authority to act on the data subject's behalf.

5. SUBMITTING A REQUEST

After completing the application form, please check to ensure that all the information you have provided is accurate and all the required documents and the fee are attached.

Please return the application form to the Data Protection Officer, New City Primary School, Tunmarsh Lane, London, E13 9NE



NEW CITY PRIMARY SCHOOL

CCTV POLICE ACCESS REQUEST AND RECORDING REGISTER

Data Protection Act 1998 - Disclosure of Personal Data under Section 29(3) of the Data Protection Act 1998.

Description of Incident / Person(s) involved:		Camera Location:	
Date of incident:		Approximate time of incident (24 hours):	
Name of person who requested to view the recorded image:		Signature:	Date of request:
Contact Telephone Number:		Email:	
Name of person who recorded the image(s) onto digital media:		Signature:	
Date images were recorded:		Disc reference number:	
Name of person who received the image(s):		Signature:	Date received:
Name of person who received the image(s):		Signature:	Date received:

