



Hillside Junior School CCTV Policy 2017-22

Updated September 2020 due to installation of additional cameras

POLICY DETAILS:

Legal Status: Non-Statutory

Adopted: 15 May 2017

Version Date: May 2017

Interim Review: November 2019

Next Review: May 2022

1. INTRODUCTION

- 1.1. The purpose of this policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at Hillside Junior School, hereafter referred to as 'the school'.
- 1.2. The system comprises of 17 fixed cameras, which are located around common areas of the school, inside and out. All cameras are monitored from a central point and are only available to selected senior staff. They can be viewed in the server room and on the Headteacher's and Deputy Headteacher's workstations.
- 1.3. This policy follows Data Protection Act guidelines.
- 1.4. This policy will be subject to review in 2022.
- 1.5. The CCTV system is owned by the school.

2. OBJECTIVES OF THE CCTV SYSTEM

- 2.1. To protect pupils, staff and visitors
- 2.2. To prevent bullying
- 2.3. To increase personal safety and reduce the fear of crime
- 2.4. To protect the school buildings and assets
- 2.5. Without prejudice, to protect the personal property of pupils, staff and visitors
- 2.6. To support the police in preventing and detecting crime
- 2.7. To assist in identifying, apprehending and prosecuting offenders
- 2.8. To assist in managing the school

3. STATEMENT OF INTENT

- 3.1. The CCTV system will seek to comply with the requirements both of the Data Protection Act and the Information Commissioner's Code of Practice.
- 3.2. The school will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.
- 3.3. Cameras will be used to monitor activities within the school and its grounds to identify criminal activity actually occurring, anticipated, or perceived. It will be used for the purpose of securing the safety and wellbeing of the pupils, staff and school together with its visitors. The system has been designed to, where possible, minimise observation of adjacent private homes, gardens and other areas of private property.
- 3.4. Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.
 - 3.4.1. Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police.
 - 3.4.2. Images will never be released to the media for purposes of entertainment.
- 3.5. The planning and design has endeavoured to ensure that the system 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.
- 3.6. Information signs as required by the Code of Practice of the Information Commissioner will be clearly visible on the site.

4. OPERATION OF THE SYSTEM

The CCTV system will be administered and managed by the school in accordance with the values and objectives expressed in the policy. The day-to-day management will be the delegated responsibility of the Headteacher during the day, and the site staff out of hours and at weekends. Viewing of recorded images must take place in a restricted area with controlled access. The Headteacher's and Deputy Headteacher's computers are password protected and the CCTV online system also requires a password. The CCTV system will be operated 24 hours each day, every day of the year, recording all activity. All operators and others with access to images must be aware of the access procedures that are in place.

5. LIAISON

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

6. DOWNLOAD MEDIA PROCEDURES

- 6.1. In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any download media used to record events from the hard drive must be prepared in accordance with the following procedures:
 - 6.1.1. Each download media must be identified by a unique mark.
 - 6.1.2. Before use, each download media must be cleaned of any previous recording.
 - 6.1.3. If download media is archived the reference must be noted.
- 6.2. Images may be viewed by the police for the prevention and detection of crime.
- 6.3. A record will be maintained of the release of any download media to the police or other authorised applicants.
- 6.4. Viewing of images by the police must be recorded in writing.
- 6.5. Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the download media (and any images contained thereon) remains the property of the school, and download media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the police to pass the download media (and any images contained thereon) to any other person. The police may require the school to retain the download media for possible use as evidence in the future. Such download media will be properly indexed and securely stored until they are needed by the police.
- 6.6. Applications received from outside bodies (e.g. solicitors) to view or release images will be referred to the Headteacher. Legal advice will be taken as required.

7. ASSESSMENT OF THE SYSTEM AND CODE OF PRACTICE

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

8. COMPLAINTS

Any complaints in relation to the school's CCTV system should be addressed to the Headteacher in writing.

9. ACCESS BY THE DATA SUBJECT

- 9.1. 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.
- 9.2. Requests for Data Subject Access should be made in writing to the Co-Headteachers.

10. PUBLIC INFORMATION

Copies of this policy will be available on the School website or from the school office.

Summary of Key Points

- This Code of Practice will be reviewed every five years.
- The CCTV system is owned and operated by the school.
- Liaison meetings may be held with the Police and other bodies.
- Recording discs used will be properly indexed, stored and destroyed after appropriate use.
- Discs may only be viewed by Authorised School Officers and the Police.
- Discs required as evidence will be properly recorded witnessed and packaged before copies are released to the Police.
- Discs will not be made available to the media for commercial or entertainment.
- Discs will be disposed of securely by incineration.
- Any breaches of this code will be investigated by the Co-Headteachers. An independent investigation will be carried out for serious breaches.
- Breaches of the code and remedies will be reported to the Co-Headteachers.

Signed by Headteacher:

Mr Andrew DAVIES

Signed by Chair of Governors:.....

Mrs Joy MASON

Date:

CCTV Privacy Impact Assessment Form

INTRODUCTION

- 1.1 This Privacy Impact Assessment (PIA) CCTV is recommended in The Surveillance Camera Code of Practice, issued by the Surveillance Camera Commissioner in June 2013 in accordance with Section 30 (1) (a) of The Protection of Freedom Act 2012. The purpose of the PIA is to ensure that privacy risks are minimised while allowing the aims of the project to be met whenever possible.
- 1.2 The purpose of this Privacy Impact Assessment is to ensure compliance with the Surveillance Camera Code of Practice Principle 2 - The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
- 1.3 Principle 2 identifies 'the need for a privacy impact assessment process to be undertaken whenever the development or review of a surveillance camera system is being considered to ensure that the purpose of the system is and remains justifiable, there is consultation with those most likely to be affected, and the impact on their privacy is assessed and any appropriate safeguards can be put in place. Where such an assessment follows a formal and documented process, such processes help to ensure that sound decisions are reached on implementation and on any necessary measures to safeguard against disproportionate interference with privacy. In the case of a public authority, this also demonstrates that both the necessity and extent of any interference with Article 8 rights has been considered.'
- 1.4 A privacy impact assessment also helps assure compliance with obligations under the Human Rights Act 1998 which specifies that;
 - a. Everyone has the right to respect for his private and family life, his home and his correspondence.
 - b. There shall be no interference by a public authority with the exercise of this right except such as in accordance with the law and as is necessary in a democratic society in the interests of national security, public safety or the economic wellbeing of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.
- 1.5 'Personal data' as defined by Section 1(1)(a) of the Data Protection Act means data which relates to a living individual who can be identified:
 - (a) from those data, or
 - (b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

STORAGE AND MANAGEMENT OF CCTV RECORDED DATA

2.1 The Hillside Schools operates a Code of Practice which ensures compliance with relevant legislation in relation to the management and operation of public space CCTV.

2.2 CCTV recording equipment is contained in the Server Room which is a secure area. Access to this area is for authorised personnel by appointment only and all callers are authenticated prior to entry and required to sign in and out of the premises.

2.4 Recorded images are recorded on to stand alone Network Video Recorders and retained for 28 days before being automatically deleted. Recorded images will only be retained for longer than 31 days if a request is made under the Data Protection Act, Freedom of Information Act, the Police and Criminal Evidence Act 1984 or the Criminal Procedures and Investigations Act 1996.

RESPONSIBLE PERSON CONTACT DETAILS

Below are the contact details of the person most qualified to respond to questions regarding Privacy Impact Assessment:

Name: Andrew DAVIES

Title: Headteacher

Organisation: Hillside Junior School

Email: office@hillsidejunior.org

Telephone: 01923 825991

Camera Specific - Prior to INSTALLATION

1	Why is a camera being considered for installation?	To protect pupils, staff and visitors To prevent bullying To increase personal safety and reduce fear of crime To protect the school buildings and assets Without prejudice, to protect the personal property of pupils, staff and visitors To support the police in preventing and detecting crime To assist in identifying, apprehending and prosecuting offenders To assist in managing the school			
2.	Has there been consultation before the camera was installed?	Yes		No	X
2b	If yes, what was the outcome of the consultation?				
2a	If no, why wasn't it undertaken?	Governing Body decided the following criteria was sufficient: 1. Insurance recommendation 2. Support compliance with safeguarding 3. Improve overall site security			

Camera Specific – Prior to INSTALLATION & REVIEW

3	What type of camera is being considered or in place?	N/A			
4	Is audio recording an available feature of this camera?	Yes		No	X
4a	If yes; What measures are in place to protect private dialogue?	N/A			
5	Does this camera have any other camera specific or software related	Yes		No	X
5a	If yes; What software/function?	N/A			
5b	What is the purpose of having/installing this function or software?	N/A			
5c	What measures are in place to protect privacy when using this function/software?	N/A			

6	Do the cameras have the capacity to record personal information.	Yes	<input checked="" type="checkbox"/>	No	
6a	If yes, please explain what and why?	Anyone accessing the site and buildings (please see 2a)			
7	Is there any chance of this footage being released in the public domain?	Yes		No	<input checked="" type="checkbox"/>
7a	If yes, explain why and what are the controls in place?	N/A			
8	Is there a Data Protection Act compliant sign clearly displayed in close proximity of the camera to make people aware that CCTV is in operation?	Yes	<input checked="" type="checkbox"/>	No	
9	Does the camera cover any part of any property where there is an expectation of privacy?	Yes		No	<input checked="" type="checkbox"/>
9a	If yes what is covered?	N/A			
9b	What measures have been taken to prevent observation of these areas?	N/A			
10	Does any additional action need to be taken to reduce the impact on privacy by this camera?	Yes		No	<input checked="" type="checkbox"/>

Camera Specific – POST Installation

1	Has the purpose of the camera(s) been reviewed?	Yes		No	X
		Date:-			
1a	What was the outcome of the Review?	N/A			
2	Has Hillside Junior School ever received a complaint relating to the impact on privacy by this camera?	Yes		No	X
2a	Please give details of the source and nature of the complaint and the outcome.	N/A			

Action to be taken	Responsibility of	By When	Status	Completed Date
N/A				

Assessor

Signature:Date:.....

Print Name:.....

Manager

Signature:.....Date:.....

Print Name:.....

Review Date: May 2022