



# Ysgol Plas Brondyffryn CCTV Policy

Lead Person: Kevin Mowbray  
Approved by governors: May 2019  
To be reviewed: May 2021

## **1. Description of Policy Formation and Consultation Process**

This Policy has been formulated by a working party consisting of the Senior Leadership Team. Staff, governors and parents were consulted before the Policy was finalised and formally adopted by the Governing Body.

## **2. Introduction**

The CCTV system within the school is used for a number of reasons e.g. it is used to help protect against crime and also aids in the safety of pupils, staff, governors, parents and members of the public while on school premises.

The camera system comprises a number of fixed and dome cameras located around the school site. All cameras can be monitored and adjusted in the respective Reception offices.

This code of practice complies with the Data Protection Act obligations and principles and will be subject to review annually. The CCTV system is owned solely by the school.

## **3. Objectives of the CCTV System**

- 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 & staff
- To assist in managing the school (excluding staff capability issues)
- To deter serious Health and Safety risks to the school.

## **5. Statement of Intent**

The CCTV system will be registered with the Information Commissioner under the terms of the Data Protection Act 2018 and will seek to comply with the requirements both of the Data Protection Act and the Information Commissioners CCTV Code of Practice (2008 edition).

The CCTV system and all information, documents and recordings obtained and used as data is protected by the Act and will be treated in the strictest of confidence.

CCTV Cameras will be used to monitor activities within the school, its car parks and surrounding grounds to identify criminal activity actually occurring, anticipated, or perceived, for the purpose of securing the safety and well being of all.

Private dwellings and property, other than that in the periphery of a view that is centrally focused upon school site locations, will be blanked out from any camera view.

Unless an immediate response to a situation is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained, as set out in the Regulation of Investigatory Powers Act 2000. Images will only be released to the police in respect of the investigation into a specific crime and with the written authority of the police. Such requests shall be authorised by an Inspector or higher on the form attached at Appendix 1.

Images will only be released to the media for use for purposes agreed by those individuals pictured in the images or if requested by the police.

No images will be released to anyone for the purposes of entertainment.

It is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Signage stating the use of CCTV, as required by the Code of Practice of the Information Commissioner will be placed at all access routes to areas covered by the school CCTV.

## **6. Operation of the System**

The scheme will be managed by the Headteacher, in accordance with the principles and objectives expressed in this policy.

The day-to-day management will be the responsibility of the Headteacher/Assistant Headteacher on site and the Business Manager during the school day and the Caretaker out of hours and at weekends.

The control panel will only be used by the above mentioned staff and/or authorised County Officials.

The CCTV system will be in operation 24 hours a day, every day of the year.

## **7. Control of Cameras**

The Administrative Officer on each site will, on a daily basis, check that all cameras are functional and the system is recording.

Unless an immediate response to a situation is required, staff must not direct cameras at an individual or a group of individuals.

Administrative functions will include the maintenance of hard disc space.

Authorised users and managers of the CCTV System must satisfy themselves of the identity of anyone requesting access to the CCTV System and the purpose of the access as set out in section 5. Where any doubt exists over the grounds for access, permission will be refused.

Emergency procedures will be used in appropriate cases to call the emergency services.

## **8. Liaison**

Liaison meetings may be held with the Senior Leadership Team, Site Staff and Contractors, in the support of the system.

## **9. Monitoring Procedure**

Camera surveillance may be maintained at all times.

A monitor and PC is installed in the Reception Office to which the CCTV continuously records images.

If covert surveillance is planned, authorisation must be sought and granted by an Authorising Officer of Denbighshire County Council in accordance with the RIPA policy (Version 2010) prior to commencement. If there is any doubt on the procedure guidance must be sought from the Council's Monitoring Officer/Head of Corporate Governance.

## **10. CD/DVD/Tape Recording Media Procedures**

In order to maintain and preserve the integrity of the media used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

- a) Each record must be identified by a unique mark.
- b) Before using each recording media must be cleaned of any previous recording.
- c) The controller shall register the date and time of recorded insert, including the reference.
- d) A recording required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure store. If the record 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 secure storage.
- e) If the record is archived, the reference must be noted. Recording media may be viewed by designated operators and the police for the prevention and detection of crime.
- f) The school's CCTV hard drive is programmed to retain images on a rolling 2 week schedule after which time all images are over-written.

A record will be maintained of the release of records to the police or other authorised applicants.

Viewing of records by the Police must be recorded in writing in the log book. Requests by the Police can only be actioned under section 29 of the Data Protection Act 2018 on the Form attached as Appendix 1.

Should a record be required as evidence, a copy may be released to the police under the procedures described in this policy. Records will only be released to the police on the clear understanding that the record remains the property of the school, and both the record and information contained on it are to be treated in accordance with this policy. The school also retains the right to refuse permission for the police to pass on the record or any part of the information contained therein to any other person unless a court order ordering disclosure is sought. The Police may require the school to retain the stored records for possible use as evidence in the future. Such records will be properly indexed and securely stored until they are needed by the police.

Applications received from outside bodies (e.g. solicitors) to view or release records will be referred to the Headteacher. Charges will be made to cover the costs of producing the material which will include the costs of redacting any third parties in order to avoid a breach of the Data Protection Act where necessary. In these circumstances this personal data will only be released upon satisfactory documentary evidence being produced in the form of ID, a court order or in accordance with s.35 of the Data Protection Act (disclosures in connection with legal proceedings). Guidance may be sought from the Council's legal/corporate governance department in order to ensure there is no breach of privacy rights or any prejudice to the investigation, apprehension or prosecution of an offender.

Any requests from parents or pupils to view or release records will be treated as Subject Access Requests under the Data Protection Act 2018.

### **11. Breaches of the code (including breaches in security)**

Any breach of this policy by school staff will be initially investigated by the Headteacher (or appointed senior member of staff to this role), in order for them to take the appropriate disciplinary action.

Any serious breach of the Code of Practice will be immediately investigated and recommendations made on how to remedy the breach.

### **12. Assessment of the scheme and code of practice**

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

### **13. Complaints**

Any complaints about the schools CCTV system should be in writing, and addressed to the Headteacher or, where the complaint is about the Headteacher, to the Chair of Governors. Complaints will be investigated in accordance with this policy.

### **14. 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. 'Subject Access Requests' should be made in writing, with the appropriate ID, to the Headteacher and the School reserves the right to charge a fee of £10 in accordance with the Act. Digital recordings will be kept for a maximum of 14 days, unless specific incidents have been recorded to disk for investigation.

### **15. Public Information**

Copies of this Policy will be available to the public from the school upon request.

### **16. Further Information**

#### **Freedom of Information Act 2000**

Since January 2005, anyone can request access to any piece of information that the school holds and CCTV falls within the scope of "information held".

By regularly deleting/overwriting the CCTV tapes in accordance with the retention procedures (detailed above - paragraph 10), it will reduce the amount of CCTV information held. If the CCTV data is held at the time of a FOI request, it cannot subsequently be deleted, even if it falls due for deletion under the retention guidelines. Careful consideration must be given to any release of personal data under the FOIA in order to avoid any breach of the data protection principles.

#### **Equality Impact Assessment completed**

An Equality Impact Assessment offers an opportunity for staff to think carefully about the impact of their work on local people and other members of staff.

#### **Date completed:**

May 2016