

# Being the best we can be

Standards, Respect, Achievement, Care



## CCTV Policy

Date Policy formally approved by Governing Body/Committee:	
Date Policy becomes effective:	
Review Date(s):	
Issue No:	1
Is this Local Authority or School Policy	Local Authority
Is this a statutory or recommended policy/document	
Is this a new or a revised policy	Reviewed
Signed (Headteacher/School)	
Signed (Chair of Governing Body / Chair of Committee)	

**Member of staff responsible: Site Manager**

## **Objectives**

1. To protect the school buildings and their assets
2. To increase personal safety and reduce the fear of crime
3. To support the Police in a bid to deter and detect crime
4. To assist in the identification and apprehension of offender(s)
5. To protect children, staff and visitors to the school
6. To assist in the management of the school

## **Statement of Intent**

The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements of both 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 only be used to monitor activities within the school, its car parks and other public areas to identify criminal or anti-social behaviour actually occurring, anticipated or perceived, and for the purpose of securing the safety and well being of the school, together with its staff, pupils and visitors.

Staff have been instructed that cameras are not to focus on private homes, gardens and other areas of private property.

Unless an immediate response to an incident is required, staff must not direct cameras at an individual, their property or a specific group of individuals without authorisation being obtained as set out in the Regulation of Investigatory Powers Act 2000 which deals with Directed Surveillance.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recorded materials will only be released to the media for use in an investigation of a specific crime and with the written authority of the Police. Recorded materials will never be released to the media for entertainment purposes.

The planning and design of the CCTV system has endeavoured to ensure that the cameras will give maximum effectiveness and efficiency but it is not possible to cover or detect every single incident taking place in the areas covered by cameras.

Warning signs as required by the Code of Practice of the Information Commissioner have been placed prominently in the areas covered by the school's CCTV system.

### **Operation of the System**

The CCTV system will be administered and managed by the Head or delegated member of staff, in accordance with the principles and objectives expressed in the code.

The day-to-day management will be the responsibility of the Site Manager, under the line management of the Finance Manager, during the day, out of hours and at weekends.

### **Operational Control**

The Site Manager will check and confirm the efficiency of the system daily to ensure all cameras are working correctly and the system is recording images from those cameras at the required frame rate.

Access to the viewing monitor(s) will be strictly limited to selected teaching and administrative staff, together with those directly involved in the security of the school site. Unless an immediate response to an incident is required, staff must not direct cameras at an individual or a specific group of individuals.

Staff, visitors, contractors and others entering areas with CCTV monitors should be strictly regulated and staff must satisfy themselves as to the identity and purpose of the visit and record these details in a suitable book. If any doubt exists the CCTV images must be turned off until the visitor leaves the area. Casual observations will not be permitted.

If an emergency arises out of hours, permission must be obtained from the Headteacher to view or process recorded material. All incidents involving the Emergency Services must be notified.

Other operational functions will include managing and maintaining recordings on tapes or hard disc space, filing and maintaining incident and system maintenance logs.

Retention periods in respect of the film/images will be a minimum of 15 days unless retention is necessary for a longer period. For example, where a law enforcement agency is investigating a crime. During the retention period the images will be kept securely in accordance with the obligations of the Data Protection Act 1998.

## **Recorded Material Procedures**

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

1. Each item of recorded material must be identified by a unique mark.
2. Before use each item on which images will be recorded must be cleared of any previous recording.
3. The person making the recording shall register the date and time of recorded material insert including recorded material reference.
4. Any recorded material required for evidential purposes must be sealed, signed and stored securely. If recorded material is not copied for the Police before it is sealed, a copy may be made at a later date providing that it is resealed, signed and returned to its secure location.
5. Recorded materials may be viewed by the Police for the prevention and detection of crime, authorised officers of North Wales Police for supervisory purposes, and authorised demonstration and training.

6. A record will be maintained of the release of recorded materials to the Police or other authorised applicants. A register will be kept for this purpose and available for inspection.
7. Viewing of recorded material by the Police requested under Section 29 of the Data Protection Act 1998 must also be recorded in a register.
8. Should recorded material be required as evidence, a copy may be released to the Police under the procedures described above. Recorded materials will only be released to the police on the clear understanding that the recorded material remains the property of the school, and both the recorded material and information contained on it are to be treated in accordance with this code of practice.
9. The school also retains the right to refuse permission for the Police to pass to any other person the recorded material or any part of the information contained thereon. On occasions when a Court requires the release of original recorded material then this will be produced from the sealed recording which is retained at the school in its secure location.
10. The Police may require the school to retain the stored recorded material for possible use as evidence in the future. Such recorded material will be properly indexed and properly and securely stored until required by the Police.
11. Applications received from outside bodies (e.g. solicitors) to view or release a copy of the recorded material will be referred to the Headteacher. In these circumstances, recorded materials will normally be released where satisfactory documentary evidence is produced showing they are required in legal proceedings a subject access request, or in response to a Court Order. A fee of £10 in respect of a subject access request can be charged and in other cases a sum not exceeding the cost of materials.

### **Breaches of the Code or Breaches of Security**

The Deputy Headteacher will initially investigate any breach of the Codes of Practice by school staff in order that the appropriate disciplinary action is taken.

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

### **Complaints**

Any complaints about the CCTV system should initially be addressed to the Headteacher.

Complaints will be investigated in accordance with this Code of Practice and Headteachers can seek advice from either the Councils Security Client Officer or the Council Solicitor in the Legal and Administration Department if necessary.

## **Access by the Data Subject**

The Data Protection Act provides Data Subjects (individuals to whom personal data relates) with a right to data held about themselves which includes those obtained by CCTV.

Requests for Data Subject Access should be made on an application form available from the Councils Archivist and Records Manager based at Wrexham Museum. Tel. No 01978 - 317976.

## **Public Information**

Copies of this Code of Practice will be available from the school office on request.

## **Checklist for CCTV Signage**

- specify the purpose for which the system has been installed;
- signs must be placed in a prominent position to inform the public that they are entering an area where their images could be recorded;
- if the sign contains an image of a camera then it need only state who is the data controller (Ysgol Clywedog) in charge of the CCTV system and give a contact number where further information can be obtained;
- the equipment should be sited in such a way that it only monitors those spaces that are intended to be covered by the equipment;
- staff who operate and monitor CCTV must be aware of the purposes for which the scheme has been established;
- staff must be aware that they are only able to use the equipment in order to achieve the purposes for which it has been installed.

## Dos and Dont' s of Using the CCTV

### DO

Undertake regular reviews of both the use of the CCTV system and the procedures to ensure that the law is being complied with.

Ensure that film/images are not kept for longer than is necessary.

Process (working with, using, passing on data) images in a lawful manner.

Make certain there are procedures for dealing with police enquiries i.e. access under the DPA or removal of evidence under the Police and Criminal Evidence Act.

Formally assess the appropriateness of, and reasons for, using CCTV

### DONT

Use CCTV footage for any other purpose other than what it was originally intended for, e.g. Crime Prevention and Community Safety.

Film areas that could amount to an infringement of personal privacy.

Disclose data to third parties, unless it is lawful to do so.

Use Intrusive Surveillance at all. i.e. do not use cameras with pan tilt and zoom capabilities to monitor inside someone's home or car or systematically monitor the same person. If this is the only method of obtaining the information needed seek prior authorisation under RIPA.

### IF IN DOUBT SEEK ADVICE

#### GUIDANCE OR CCTV SIGNAGE

Steve Fox. Security Client Officer.  
Facilities and Infrastructure  
Telephone No 01978 297211  
E-mail [steve.fox@wrexham.gov.uk](mailto:steve.fox@wrexham.gov.uk)

#### DATA PROTECTION OR RIPA

Lisa Jones. Solicitor.  
Legal and Administration  
Telephone No 01978 292233  
E-mail [lisa.jones@wrexham.gov.uk](mailto:lisa.jones@wrexham.gov.uk)

Signed \_\_\_\_\_  
On behalf of the school

Date \_\_\_\_\_



Signed \_\_\_\_\_  
On behalf of the governing body

Date \_\_\_\_\_