



Ysgol Uwchradd
PRESTATYN
High School

CCTV Policy

Author	Date Adopted by Gov Body	Signed by Chair of Gov	Review Date
NC	20/5/15	L. Davenport	May 2016
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Prestatyn High School

CCTV Policy

Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Prestatyn High School.

The system comprises a number of fixed and dome cameras located around the school site. All cameras are monitored within the School.

This Code follows Data Protection Act guidelines.

The Code of Practice will be subject to review periodically by the school's Governors and distributed to all employees of the school.

The CCTV system is owned by the school.

Data Protection Group:

Mr K Roberts

Mrs H Jones

Mrs J Phillips

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
- To assist in managing the school

Statement of intent

The school will treat the system and all information, documents and recordings obtained and used as data which is protected by the Act.

Cameras will be used to monitor activities within the school and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well being of the school, together with its visitors.

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

The CCTV surveillance software is placed on devices of staff that have been authorised access by the Senior Leadership Team.

Authorised staff having access to the surveillance software should only access the software themselves or with other authorised member of staff. No unauthorised staff should be present when the surveillance software is accessed on a device.

If an immediate response to events is required, staff must not access the CCTV or direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained from the Senior Leadership Team for surveillance to take place.

CCTV recordings are stored for access by the Senior Leadership Team only. ICT have permission to access this folder if requested to do so by the Senior Leadership team.

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

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.

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 system will be administered and managed by a member of the Senior Leadership Team in accordance with this policy.

The day-to-day management of the system will be the responsibility of a designated member of the Senior Leadership Team.

The CCTV system will be operated 24 hours each day, every day of the year

The ICT team will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.

Access to the CCTV system is limited to the Senior Leadership Team, Heads of Learning, Student Support Team, Site Manager.

The CCTV system must only be accessed by staff from an authorised list, no unauthorised staff must be present at the time of access. Access to the CCTV will be refused for any staff that are not on the authorised list. ICT staff must only operate the CCTV system on request from an authorised member of staff relating to an incident.

Maintenance to the system must only be carried out by the CCTV company AGS or another authorised company.

Overview of the system

The CCTV system includes approximately 45 cameras throughout school.

The CCTV system runs 24 hours a day, 7 days a week.

The CCTV system is managed locally across the school by staff from contractors acting on the school's behalf (AGS) and in house security.

The CCTV system comprises fixed position cameras; pan tilt and zoom cameras; monitors; multiplexers; digital recorders and public information signs.

CCTV cameras are located at strategic points in school, principally at the entrance and exit point of sites, buildings and in main thoroughfares throughout the school.

CCTV signs will be prominently placed at strategic points and at entrance and exit points of the school to inform staff, students, visitors and members of the public that a CCTV installation is in use.

Although every effort has been made to ensure maximum effectiveness of the CCTV system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

Data Protection Act 1998

For the purpose of the Data Protection Act 1998 Prestatyn High School is the data controller.

CCTV digital images, if they show a recognizable person, are personal data and are covered by the Data Protection Act 1998.

This policy is associated with the school's Safe Use of IT & Data Protection Policy, the provisions of which should be adhered to at all times. The School's Safe Use of IT & Data Protection Policy is overseen by the Data Protection Group:

Data Protection Group, Prestatyn High School, 2 Princes Avenue, Prestatyn, Denbighshire, LL19 8RS Telephone: 01745 852312

The appropriateness of and reasons for using CCTV will be assessed and documented.

The purpose of the proposed CCTV system will be established and documented.

Responsibility for day to day compliance with this policy will be established and documented.

Access to images

Access to images will be restricted to authorized staff that need to have access in accordance with the purposes of the system.

Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following:

- Police and other law enforcement agencies where the images recorded could assist in a specific criminal enquiry and/or the prevention of terrorism and disorder.
- Prosecution agencies, appropriate members of school staff (such as Human Resources Manager) in the course of staff or student disciplinary proceedings (including prospective proceedings) to ensure compliance with the school's regulations and policies.
- People whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal enquiries).

Images that have been recorded may be viewed on site by the individual whose image has been captured and/or a uniformed police officer when responding to routine incidents which occurred on the same day. No copies may be taken off site.

Individual access rights

The Data Protection Act 1998 gives individuals the right to access personal information about themselves, including CCTV images.

All requests for access to a copy of CCTV footage by individuals should be made in writing to Mr A Hall, Senior Leader at the school.

If disclosure of an image will reveal third party information, legal advice must be taken.

Requests for access to CCTV images must include:

- a) The date and time the images were recorded
- b) Information to identify the individual, if necessary
- c) The location of the CCTV camera
- d) Authorisation from Mr A Hall

The school will respond promptly and at the latest within 30 calendar days.

Access to images by third parties

Unlike Data Subjects, third parties who wish to have a copy of CCTV images (i.e. images not of the person making the request) do not have a right of access to images under the DPA, and care must be taken when complying with such requests to ensure that neither the DPA or the CCTV Policy are breached. As noted above, requests from third parties will only be granted if the requestor falls within the following categories:

- Law enforcement agencies (where the images recorded would assist in a specific criminal enquiry)
- Prosecution agencies
- Appropriate members of school staff (such as Human Resources Manager and other authorized staff) in the course of staff or student disciplinary proceedings (including prospective proceedings) to ensure compliance with the school's regulations and policies.

All third party requests for access to a copy of CCTV footage should be made in writing to:
Mr A Hall, Prestatyn High School, 2 Princes Avenue, LL19 8RS.

If a law enforcement or prosecution agency is requesting access they should make a request under Section 29 of the Data Protection Act 1998.

Request to prevent processing

In addition to rights of access, data subjects also have rights under the DPA to prevent processing (i.e. monitoring and recording CCTV images) likely to cause substantial and unwarranted damage to that person, or prevent automated decision taking (i.e. through the use of visual recognition software) in relation to that person.

Should any person visiting Prestatyn High School have any concerns regarding the operation of the CCTV systems, the following procedure must be complied with.

The Data Subject should be directed to Mr A Hall to determine whether the Data Subject is making a request to prevent processing or automated decision making.

The school will respond promptly and at the latest within 30 calendar days.

Retention and disposal

Any authorised staff storing video and images should only do so through the CCTV folder on the Admin Drive, where only authorised staff have permission to access that folder. Authorised staff must never remove the contents of that folder to be placed elsewhere on the network, it must be accessed and retained in the CCTV folder. The contents of the CCTV folder will be removed every 90 days, unless a request has been made to retain the contents.

Any video/ recorded images unless required for evidential purposes, the investigation of a crime or otherwise required by law, will be retained for no longer than 90 days from the date of recording.

At the end of their useful life all images stored will be erased and securely removed as confidential waste.

All still photographs and hard copy prints also will be securely disposed of as confidential waste.

Maintenance and review

This policy will be reviewed a year after agreed, and thereafter not less than every two years or when the law changes.

Central responsibilities

The school Governors committee is responsible for approving and reviewing this policy.

Mr A Hall, Senior Leader is responsible for compliance with and implementation of this policy. Providing guidance on requests for covert recording. Providing guidance regarding subject access requests and third party requests for access to footage.

The Business & Finance Manager and the data protection group are responsible for maintaining this

policy, providing guidance and support on the application of the Data Protection Act.

Complaints regarding operation of system

Complaints regarding the CCTV system and its operation must be made in writing to:

Mr A Hall

Prestatyn High School

2 Princes Avenue.

LL19 8RS.

The school will respond promptly and at the latest within 30 calendar days.

Associated policies and guidance

- Data Protection Policy
- Home Office Surveillance Camera Code of Practice
- Data Protection

CCTV Policy

“A Community Achieving Together”

“Cymuned yn Llwyddo Fel Un”