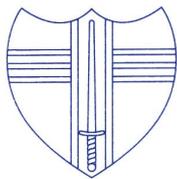


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CCTV SYSTEM POLICY

Reviewed by K Hurd/A Brignall	09/11/2016
Approved by the LGB	21/11/2016
Next review date	October 2017

INTRODUCTION (1)

1.1 The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at All Saints C.E. Junior Academy, hereafter referred to as 'the Academy'.

1.2 The system comprises of a number of fixed cameras located around the Academy site. All cameras are monitored within the Academy and by the Academy's preferred monitoring company.

1.3 This Code follows Data Protection Act guidelines.

1.4 The Code of Practice will be subject to review periodically, but at least annually, to include consultation as appropriate with interested parties.

1.5 The CCTV system is owned by the Academy.

OBJECTIVES OF THE CCTV SCHEME (2)

- 2.1 (a) To protect the Academy buildings and their assets
- (b) To increase personal safety and reduce the fear of crime
- (c) To support the Police in a bid to deter and detect crime
- (d) To assist in identifying, apprehending and prosecuting offenders
- (e) To protect members of the public and private property
- (f) To assist in managing the Academy

STATEMENT OF INTENT (3)

3.1 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 both of the Data Protection Act and the Commissioner's Code of Practice.

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

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

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

3.4.2 Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without appropriate authorisation being obtained and recorded in the CCTV System Access Log.

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

3.6 The planning and design has endeavoured to ensure that the Scheme 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.

3.7 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 Academy CCTV.

OPERATION OF THE SYSTEM (4)

4.1 The Scheme will be administered and managed by the Associate Principal, in accordance with the principles and objectives expressed in the code.

4.2 The day-to-day management will be the responsibility of both the Senior Leadership Team and the Business Manager and Caretaker during the day.

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

CONTROL ROOM (5)

5.1 The Business Manager will check and confirm the efficiency of the system on a weekly basis and in particular that the equipment is properly recording and that cameras are functional.

5.2 Access to the CCTV facilities will be strictly limited to the SLT, the Business Manager and Caretaker.

5.3 Control operators must satisfy themselves over the identity of any other visitors to the Control equipment area and the purpose of the visit. Where any doubt exists access will be refused.

5.4 The system may generate a certain amount of interest. It is vital that operations are managed with the minimum of disruption.

5.5 If out of hours emergency maintenance arises, the Control Room Operators must be satisfied of the identity and purpose of contractors before allowing entry.

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5.6 Full details of maintenance/checking of equipment will be recorded, including time/date of entry and exit.

5.7 When not manned the equipment must be kept secured.

5.8 Other administrative functions will include hard disc space, filing and maintaining occurrence and system maintenance logs.

5.9 Emergency procedures will be used in appropriate cases to call the Emergency Services.

LIAISON (6)

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

MONITORING PROCEDURES (7)

7.1 Camera surveillance may be maintained at all times.

7.2.1 A monitor is installed in the Control facility to which pictures will be continuously recorded.

7.2.2 If covert surveillance is planned or has taken place copies of the Authorisation Forms, including any Review must be completed and retained.

VIEWING CAPTURED DATA (8)

8.1 In order to maintain and preserve the integrity of the data 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:

(i) Data required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence DVD store.

(ii) If the data 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 the evidence DVD store.

(iii) If the data is archived the reference must be noted.

8.2 Data may be viewed by the Police for the prevention and detection of crime.

8.3 A record will be maintained of the release of data to the Police or other authorised applicants. A register will be available for this purpose.

8.4 Viewing of data by the Police must be recorded in writing and in the log book. Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.

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8.5 Should data be required as evidence, a copy may be released to the Police. Data will only be released to the Police on the clear understanding that the data remains the property of the Academy, and both the data and information contained on it are to be treated in accordance with this Code. The Academy also retains the right to refuse permission for the Police to pass to any other person the data or any part of the information contained thereon. On occasions when a Court requires the release of original data this will be produced from the secure evidence data store, complete in its sealed bag.

8.6 The Police may require the Academy to retain the stored data for possible use as evidence in the future. Such data will be properly indexed and properly and securely stored until they are needed by the Police.

8.7 Applications received from outside bodies (e.g. solicitors) to view or release data will be referred to the Associate Principal. In these circumstances data will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee can be charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

BREACHES OF THE CODE (including breaches of security) (9)

9.1 Any breach of the Code of Practice by Academy staff will be initially investigated by the Associate Principal, in order for her to take the appropriate disciplinary action.

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

ASSESSMENT OF THE SCHEME AND CODE OF PRACTICE (10)

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

COMPLAINTS (11)

11.1 Any complaints about the Academy's CCTV system should be addressed to the Associate Principal.

11.2 Complaints will be investigated in accordance with Section 9 of this Code.

ACCESS BY THE DATA SUBJECT (12)

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

12.2 Requests for Data Subject Access should be made in writing to the Associate Principal.

PUBLIC INFORMATION (13)

Copies of this Code of Practice will be available to the public from the Academy Office and the Associate Principal.

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Summary of Key Points

- This Code of Practice will be reviewed every year.
- The CCTV system is owned and operated by the Academy.
- The Control system is not open to visitors except by prior arrangement and good reason.
- Liaison meetings may be held with the Police and other bodies.
- Any recording data will be used properly, indexed, stored and destroyed after appropriate use.
- Data may only be viewed by Authorised Academy Officers and the Police.
- Data required as evidence will be properly recorded witnessed and packaged before copies are released to the Police.
- Data will not be made available to the media for commercial or entertainment purposes.
- Data will be disposed of securely by incineration.
- Any breaches of this Code will be investigated by the Associate Principal. An independent investigation will be carried out for serious breaches.
- Breaches of the Code and remedies will be reported to the Associate Principal.

Policy written: September 2010
Reviewed October 2016

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Appendix 1

ICO Checklist for users of limited CCTV systems monitoring small retail and business premises

This CCTV system and the images produced by it are controlled by the Headteacher who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998). We (The Governors of All Saints C.E. Junior Academy, Hastings) have considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of our staff and pupils. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			
There is a named individual who is responsible for the operation of the system.			
A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.			
Cameras have been sited so that they provide clear images.			
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.			
There are visible signs showing that CCTV is in operation.			
Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).			
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.			
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.			
Except for law enforcement bodies, images will not be provided to third parties.			
The Academy knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.			
Regular checks are carried out to ensure that the system is			

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This log to be kept in a secure place with copy data.

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Appendix 3

CCTV system Disclosure Log

Incident Date	Data Disclosed to: (ie Police, Solicitor, individual) NOTE NAME	Date of Disclosure:	Authorised By:	Purpose: (ie – evidence, legal proceedings subject access request, Court Order	In what form: (ie viewed on site, copy taken)

This log to be kept in a secure place with copy data.