



BUILTH WELLS HIGH SCHOOL

CCTV POLICY AND PROCEDURES

BWHS – Document Control	
Doc Number:	V.2
Date Created:	November 2014
Date Approved by W&S Committee:	9 th March 2017
Date Policy Adopted by Main Governing Body:	21 st November 2017
Date Policy Key Points to be Implemented by:	
Date Policy Completion Statement Signed Off:	
Next Review Due:	August 2018

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FURTHER INFORMATION CAN BE OBTAINED FROM – CCTV Code of Practice (Home Office) 2013 – copy to be retained with Master copy of BWHS CCTV Policy	Internet

FOREWORD

Any school that employs surveillance CCTV for whatever purposes on its site must comply with all statutory regulations covering its use, as enshrined in the Data Protection Act 1998, the Human Rights Act 1998 and in certain circumstances, the Regulation of Investigatory Powers Act 2000.

There are specific requirements that refer chiefly, but not exhaustively, to the installation of CCTV equipment and its employment, as well to the collection, analysis, dissemination and storage of data collected, that the school must address and be seen to be implementing actively.

A school is required to have a detailed policy covering every aspect of the use of surveillance CCTV and the data collected on its premises, and must have an appointed Data Controlling Officer, preferably from the Senior Management Team, to oversee and control all aspects of the use of surveillance CCTV and data collected from it.

Registration for the use of CCTV surveillance must be maintained with the Office of the Information Commissioner, from where a suitable Code of Practice on its use can also be obtained.

Health & Safety Committee
November 2014

BUILTH WELLS HIGH SCHOOL - CCTV POLICY

1. INTRODUCTION

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

The system comprises a number (fixed / dome) cameras located around the school site. Cameras are monitored from two rooms – Finance and Bwyty Offices and are only available to designated staff and members of the Senior Management Team. This Code follows Data Protection Act guidelines.

The Code of Practice will be subject to review bi-annually to include consultation as appropriate with interested parties. The CCTV system is owned by the school.

2. OBJECTIVES OF THE CCTV SCHEME

- To increase personal safety of staff, students and visitors and reduce the fear of crime.
- To protect the school buildings and their assets.
- 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.
- To monitor those owners who exercise their dogs on the school grounds
- To monitor those owners who allow their dogs to fowl on the school grounds and/or who fail to clean up after their dogs

3. 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 both of the Data Protection Act and the Commissioner's Code of Practice. <https://www.gov.uk/data-protection>

The school will treat the system and all information, documents and recordings obtained and used as data that are 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. 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 authorisation being obtained using the school's forms for Directed Surveillance (**see Appendix 2 attached to this Policy**) to take place, as set out in the Regulation of Investigatory Power Act 2000.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the Police.

Recordings will never be released to the media for purposes of entertainment.

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.

Warning signs, 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.

4. DATA PROTECTION

The system shall be used in accordance to all relevant laws and guidelines, including the Data Protection Act 1998, The Human Rights Act 1998, and if appropriate Regulation of Investigatory Powers Act 2000.

Where appropriate, safeguards will be installed to prevent cameras focusing on peoples' homes, gardens or other areas of private property (collateral intrusion).

Similar safeguards are used to limit any collateral intrusion of inappropriate locations within the school as well.

5. OPERATION OF THE SYSTEM

The Scheme will be administered and managed by the Head Teacher and the Business Manager, in accordance with the principles and objectives expressed in the Code.

The day-to-day management will be the responsibility of both the Head Teacher and Senior Management Team during the day and designated personnel for out of hours and at weekends.

The CCTV recording system will only be accessed by designated personnel. The CCTV system will be operated 24 hours each day, every day of the year.

6. INCIDENT REPORTING

All incidents should be reported to the Head Teacher / nominated Senior Manager by email.

7. INCIDENT RESPONSE

During monitoring - if criminal or suspicious activity of a serious nature is observed - then the school should immediately inform the Police. Once an incident is reported to the Police it will be dealt with in accordance with Police procedure.

8. THE EMAIL REGISTER OF INCIDENTS AND REVIEWS

The register will include the following:

- a) When searching or reviewing an incident, the purpose of doing so should be recorded by the member of staff by Email.
- b) The member of staff who has made the search will reply to the original email indicating whether the search was successful or not.
- c) The reply email will say who carried out search and/or copied of the event.
- d) The reply email will state who was present when reviewing.

- e) The initial review will give an estimate for date, start and end time of the incident, the reply email will narrow this down if possible.
- f) Details of the officer or authorised agent, collecting the copied media and their contact details, date of collection and signature.
- g) On occasion where the request relates to an ongoing incident or investigation any appropriate reference numbers should also be included.
- h) If appropriate number of Recordings or copies supplied.

9. CONTROL ROOMS (Bwyty and Finance Rooms)

A designated member of staff will check, record and confirm the efficiency of the system in conjunction with the fire alarm check, daily and in particular that the equipment is properly recording and that cameras are functional.

Access to the CCTV equipment will be strictly limited.

Unless an immediate response to events is required, staff in the CCTV Control Room must not direct cameras at an individual or a specific group of individuals.

During working hours staff must ensure the monitors in the Finance and Bwyty Rooms are switched off to prevent them being watched by unauthorized staff and / or pupils

A Visitors Book will be maintained at school reception. Full details of visitors including time / date of entry and exit will be recorded.

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

10. LIAISON

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

11. ACCESS TO RECORDED INFORMATION

The Data Protection Act provides Data Subjects (individuals to whom “personal data relates”) with a right to have access to their personal data held by an organisation, this also include CCTV images relating to them. People can make a request to view their footage by making a Subject Access Request. ***(Subject Access Requests must be made in writing on the form available from the school – See Appendix 1).***

Where Subject Access Requests are made on behalf of a data subject, a written signed consent will be required from the data subject before the access to the footage is provided. In all cases, the Data Controller must be careful not to disclose footages of other third party individuals without their prior consent.

Applications received from outside bodies (e.g. Solicitors) to view or release Recordings will be referred to the Head Teacher. In these circumstances Recordings 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.

12. MONITORING PROCEDURES

Camera surveillance may be maintained at all times. A monitor is installed in the Finance and Bwyty offices to which pictures will be continuously recorded.

If covert surveillance is planned or has taken place, copies of the Authorisation Forms, including any Review, or Cancellation must be returned to a Corporate Monitoring Officer of Builth Wells High School.

13. IMAGE STORAGE PROCEDURES

Images are stored on the digital recorder for a period of 30 days

Recordings may be viewed by the Police for the prevention and detection of crime, authorised officers of Builth Wells High School for supervisory purposes, authorised demonstration and training. A record will be maintained of the release of recordings to the Police or other authorised applicants. A register will be available for this purpose.

Viewing of recordings 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.

Should a recording be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1 (iv) of this Code. Recordings will be released to the Police on the clear understanding that the recording remains the property of the school, and both the recording and information contained on it are to be treated in accordance with this code.

The school also retains the right to refuse permission for the Police to pass to any other person the recording or any part of the information contained thereon.

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

14. VIEWING AND COPYING OF IMAGES BY APPROPRIATE PERSONNEL

Viewing or copying will be carried out only if it would assist in the school services for which the Head Teacher is responsible, or to address one of the issues stated in the "Objectives of CCTV".

The Governors and Head Teacher are not to take recorded images away from the school premises under any circumstances.

Requests to view or copy must be made by email to the nominated Senior Manager/Deputy Head and CDs will be returned to secure storage immediately after viewing.

15. BREACHES OF THE CODE (INCLUDING BREACHES OF SECURITY)

Any breach of the Code of Practice by school staff will be initially investigated by the Head Teacher in order for her to take the appropriate disciplinary action. 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.

16. STAFF TRAINING

A requirement under the CCTV Code of Practice is that personnel responsible for the system know how to manage the data and access the images. The effectiveness of the system depends on the quality of personnel selected for its operation.

The Head Teacher shall ensure that all appropriate staff are trained on the use of the equipment and familiar with their data protection responsibilities as detailed by the Home Office and the Information Commissioners Office (ICO) 2008 on the use of CCTV in public places.

17. ASSESSMENT OF THE SCHEME

Performance monitoring including random operating checks may be carried out by the nominated Senior Manager.

18. COMPLAINTS

Any complaints about the school's CCTV system should be addressed to the Head Teacher. Complaints will be investigated in accordance with Section 9 of the Code of Practice.

19. 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. Requests for Data Subject Access should be made to the Head Teacher (see 11 above).

20. PUBLIC INFORMATION

Copies of the Code of Practice is held in the school's Health and Safety Master Policies Reference File available to the public from the School Office and the Head Teacher.

SUMMARY OF POLICY KEY POINTS TO BE IMPLEMENTED

- 1. The CCTV system is owned and operated by the school.**
- 2. The Finance and Bwyty offices will not be staffed out of school hours.**
- 3. The Finance and Bwyty offices are not open to visitors except by prior arrangement and good reason.**
- 4. Liaison meetings may be held with the Police and other bodies.**
- 5. Recorded information will only be stored for 30 days.**
- 6. Recordings may only be viewed by Authorised School Officers and the Police.**
- 7. Recordings required as evidence will be properly recorded witnessed and packaged before copies are released to the Police.**
- 8. Recordings will not be made available to the media for commercial or entertainment.**

9. Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the corporate policies and procedures.
10. The BWHS CCTV Policy, Procedures and Code of Practice will be reviewed every two years / or when additional CCTV cameras are sited within the school's premises

APPENDIX 1 SUBJECT ACCESS REQUEST FORM FOR CCTV

APPENDIX 2 USE OF SURVEILLANCE – IMPACT ASSESSMENTS FORMS

The publication entitled “CCTV Code of Practice: produced by the Home Office 2013 – will be retained with master copy of BWHS CCTV Policy & Procedures.

Signed:

Chair of Governors: _____ **Date:** _____

Head Teacher: _____ **Date:** _____

Date Key Policy Points to be implemented by: _____

Date for Review: August 2018

BUILTH WELLS HIGH SCHOOL

POLICY COMPLETION STATEMENT FOR MGB

DOCUMENT : CCTV POLICY AND PROCEDURES

CATEGORY : HEALTH & SAFETY

ADOPTED : MAIN GOVERNING BODY ON

POLICY KEY POINTS / REQUIREMENTS	ACTION(S) TAKEN	DATE IMPLEMENTED
The CCTV system is owned and operated by the school.		
The Finance and Bwyty Offices will not be staffed out of school hours.		
The Bwyty Control Room is not open to visitors except by prior arrangement and good reason.		
Liaison meetings may be held with the Police and other bodies.		
Recordings may only be viewed by authorised School Officers and the Police.		
Recordings required as evidence will be properly recorded witnessed and packaged before copies are released to the Police.		
Recordings will not be made available to the media for commercial or entertainment.		
Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the corporate policies and procedures.		
The BWHS CCTV Policy, Procedures and Code of Practice will be reviewed every two years / or when additional CCTV cameras are sited within the school's premises.		
ADDITIONAL MEASURES TAKEN TO SUPPORT POLICY		

Signed to confirm:

Lead SLT for H&S: _____ **Date:** _____

Chair of H&S Committee: _____ **Date:** _____

Date for Review: _____

TO BE FILED WITH MASTER COPY OF BWHS CCTV POLICY AND PROCEDURES

APPENDIX 1

DATA PROTECTION ACT 1998 **SUBJECT ACCESS REQUEST FORM FOR CCTV**

PLEASE USE BLOCK CAPITALS TO COMPLETE THIS FORM

The Data Protection Act provides Data Subjects (individuals to whom “personal data” relates) with a right to access data held about themselves, including data held on Closed Circuit Television (CCTV) systems.

To enable Builth Wells High School to deal promptly with your request for access, please complete the form, giving as much information as possible to help us identify your personal data.

Under the terms of the Data Protection Act 1998, Builth Wells High School has 40 days to comply with your request. The processing commences when your completed form and the fee of £10 are received by the Data Protection Officer, although the processing may be delayed if you have provided insufficient details.

1. Title, name and address of the applicant

If you are the Data Subject (The *person whose information is held by Builth Wells High School*) please complete the following.

Date of birth.....Male/Female (Please delete)

Daytime telephone number

2. Are you the data subject?

Yes/No (Please *delete*) (The *person to whom the personal data relates*)

IF “YES” PLEASE PROCEED TO QUESTION 5

3. Are you the agent of the data subject with written authority?

Yes/No

(Please *delete*)

If “**YES**” please attach a copy of the authority to act on the data subject’s behalf and enter the details required for the data subject in Question 4).

If “**NO**” please answer the following:

1. (i) What is your relationship to the data subject?.....
2. (ii) Can you provide confirmation of your entitlement to act on the data subject’s behalf? YES/NO (please delete).

4. FOR USE BY AGENTS OF THE DATA SUBJECT ONLY

Please give your daytime telephone number.....

Enter the data subject's title, name, address, date of birth and gender in the space provided:

Male/Female (Please delete)

5. TO BE COMPLETED BY ALL APPLICANTS

In order for Builth Wells High School to identify what data you require access to, please provide the following information:

(i) The exact date, time and location of the CCTV system containing the footage required:

.....
.....

(ii) Information sufficient to enable identification of the Data Subject (a full description including clothing and/or a photograph. Use a separate sheet of paper if necessary).

.....
.....
.....

6. I understand that it may be necessary for Builth Wells High School to obtain more detailed information in order to be satisfied as to my/the data subject's identity or locate my/the data subject's personal data.

I enclose the fee of £10 as requested (cheques and postal orders should be made payable to Builth Wells High School).

Please note that in the event that information supplied would seriously prejudice the prevention or detection of crime, Builth Wells High School have the right under the Data Protection Act to refuse requests for access.

Signed: Dated:

Return this form to: The Head Teacher, Builth Wells High School, College Rd, Builth Wells, Powys. LD2 3BW

APPENDIX 2

USE OF SURVEILLANCE CCTV IN SCHOOLS

IMPACT ASSESSMENT FORMS

An impact assessment can be a very useful method of detailing important aspects of the use of surveillance CCTV in a school and how it will affect those present, in particular, but not exclusively, staff and students. The impact assessment needs to address the following requirements.

- The exact purpose for the use of surveillance CCTV in each any every area of coverage.
- An assessment of the suitability for the use of CCTV over other methods considered for achieving the same or similar outcome.
- An assessment of the proportionality of the level of coverage employed, with regard to amount of equipment in use and time periods for which it is activated.
- The possible/potential ways in which the data collected could be used, affecting directly or indirectly those monitored, including any restrictions on its usage, for each and every area of coverage.
- Where any/all data is stored for later possible use, the suitability of this over other methods to achieve the same information and outcomes.
- For each and every area of coverage, the identification of personnel having immediate access to the data collected through general authorisation as part of their specific duties, including the data controlling officer and other systems' monitors with general or limited authorisation on their behalf to view the data for whatever purpose.
- For each and every area of coverage, where data may be stored, how and by whom the data will be processed in any manner, and for what purpose.
- For each and every area of coverage, the identification of personnel who can gain access to any/all data collected, as an intrinsic part of their duties (only if requisite authorisation has been granted, permanently or temporarily) and where possible, indication of whether any authorised use can be made of the released data, as well as any restrictions placed upon its use by the third party.
- Detailed methods by which all personnel, whose images could be captured by an active surveillance CCTV system, will be informed of this possibility, including appropriate signs and channels through which further information can be obtained.
- Specifically, in addition to the above, if the CCTV surveillance equipment is entirely operated by an outside agency, which also controls the collection, monitoring and use of all data obtained, a clear statement to this effect with full contact details of the agency.

It is further considered desirable that for every instance where those present could possibly be captured on surveillance CCTV, an assessment will be made concerning the individual's right to privacy, limited or otherwise and the impact on their ability to perform in their most effective and personally comfortable way; this including both staff and students, but not exclusively. Whilst this assessment is bound to have a significant subjective element, it should nevertheless be considered as an important part of the overall statement.

IMPACT ASSESSMENT FOR USE OF SURVEILLANCE CCTV

A. This is an impact assessment statement for the use of surveillance CCTV at:

BUILTH WELLS HIGH SCHOOL, COLLEGE ROAD, BUILTH WELLS, POWYS LD2 3BW

This assessment has been carried out by:

..... (name)

..... (position)

The assessment is effective from / / 20 until review on / / 20

The data controlling officer for the school is:

..... (name)

..... (position)

..... (telephone contact)

..... (email contact)

Registration with the Office of the Information Commissioner last updated on / / 20

Checks for serviceability of CCTV systems and clarity of images last completed on / /

B. Areas on the school campus covered by installed surveillance CCTV, whether active or not. (At least this should include all outside areas on the school grounds, all entrances, all internal communal areas and all teaching units, individually stated where possible. Total number of possible operative cameras should be included.)

CAMERA AREA	No.		CAMERA AREA	No.

(A separate sheet should be completed for each area, giving precise details of the use of surveillance CCTV and the data collected from that area. It may be adequate to group together some areas where the information to be recorded is entirely or partially common, without loss of specific reference.)

C. Impact assessment for use of CCTV in (area)

Purpose(s) for use of surveillance CCTV:

Advantages of use of CCTV over other possible methods:

Assessment of amount of equipment used and time equipment is active:

Specific ways in which data collected will be used, including restrictions:

For stored data, the method used, the maximum length of time of storage, and how the data might be used:

All personnel having immediate access to data collected and stored, as part of specific duties:

(Included are any servicing company's personnel with general access)

Details of how data may be processed, by whom and what purpose(s):

Details of further personnel who may gain temporary access to data as part of their duties:

Methods of notification of the presence of surveillance CCTV and other information channels:

Details of all method(s) by which images, or collected data, from CCTV may be streamed to any outside agency or other parties, if relevant. Restrictions on access are also included:

Where an outside agency is entirely responsible for the operation and control of the CCTV equipment, its monitoring and the collection and use of data collected, all relevant and necessary details:

Assessment of any possible impact of CCTV surveillance on the right to privacy, performance or general well-being of any individuals:

Other relevant information: