



CCTV Policy

Statement of Intent

Avondale takes its responsibility towards the safety of staff and pupils very seriously. To that end, we use Closed Circuit Television (CCTV) cameras to monitor the members of our school in a very specific way.

This policy must be used in conjunction with the school's Data Protection Policy.

The law states that we can use a CCTV system to monitor our premises, providing our system complies with the Data Protection Act.

The purpose of this policy is to manage and regulate the use of the CCTV system at Avondale and ensure that:

- We comply with the Data Protection Act.
- The images that are captured are useable for the purposes we require them for.
- Reassure those persons whose images are being captured.

This policy covers the use of CCTV and other systems which capture moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes:

- Seeing what an individual is doing.
- Taking action relating to a crime.
- Using images of an individual in some way that could affect their privacy.

1. Objectives

1.1. The CCTV system will be used to:

- Maintain a safe environment.
- Ensure the welfare of pupils and staff.
- Deter criminal acts against persons and property.
- Assist the police in identifying persons who have committed an offence.

2. Protocols

2.1. The CCTV system will be registered with the Information Commissioners' Office (ICO) under the terms of the Data Protection Act.

2.2. The system will comply with all additional legislation including:

- The Commissioner's Code of Practice for CCTV 2008.

- The Surveillance Camera Code of Practice 2013, published by the Home Office.
- The CCTV system is a closed digital system which does not make audio recordings and has no wireless capability.
- Warning signs have been placed throughout the premises where the CCTV system is active, as mandated by the Code of Practice of the Information Commissioner.
- The CCTV system has been designed for maximum effectiveness and efficiency. The school cannot however guarantee that every incident will be detected or covered and 'blind spots' may exist.
- The CCTV system will not be trained on individuals unless an immediate response to an incident is required.
- Additionally, the CCTV system will not be trained on private vehicles or property outside the perimeter of the school.
- Recordings will only be released following written authority from the Police, or in respect of a subject access request.

Security

- Access to the CCTV system, software and data will be strictly limited to authorised operators and password protected.
- Avondale's authorised CCTV system operators are:
Judith Smith– School Business Manager
Michael Mears – Site Supervisor
- The main control facility is kept secure and locked when not in use.
- If covert surveillance is planned, or has taken place, copies of the authorisation forms and review will be completed and retained.
- Cameral systems may be maintained at all times.
- Visual display monitors are located:
- School Office

Privacy

- Live and recorded materials will only be viewed by authorised operators for the purpose of investigating incidents.
- Images, both still and moving, may be released to the police for the detection of crime under section 29 of the Data Protection Act 1998.
- Viewing of images by the police will be recorded in the log.
- Applications received from outside bodies (e.g. solicitors) to view or release images will be referred to the Headteacher.
- In circumstances where outside bodies make requests to view or release images, the Headteacher will normally release them provided satisfactory documentary evidence is produced to show that they are required for legal proceedings, a subject access request, or in response to a Court Order.
- A fee may be charged at £10 in such circumstances, which is appropriate for subject access requests.

- Images will only be retained for as long as they are required. The system will automatically delete recordings after 31 days in accordance with the Data Protection Act 1998.

Code of practice

- Avondale Primary School has a CCTV surveillance system (the 'system') for the purpose of the prevention and detection of crime and the promotion of the health, safety and welfare of staff, students and visitors.
- The system is owned by the school and images from the system are strictly controlled and monitored by authorised personnel.
- Its purpose is to ensure that the CCTV system is used to create a safer environment for staff, students and visitors to the school and to ensure that its operation is consistent with the obligations on the school imposed by the Data Protection Act 1998.

The system will:

- Always be for the purpose specified, which is in pursuit of a legitimate aim.
 - Be designed to take into account its effect on individuals and their privacy and personal data.
 - Be transparent and include a contact point through which people can access information and complaints.
 - Have clear responsibility and accountability for images and information collected, held and used.
 - Have defined policies and procedures in place which are communicated throughout the school.
 - Only keep images and information for as long as required.
 - Restrict access to retained images and information with clear rules on who can gain access
 - Consider all operational, technical and competency standards relevant to a system and its purpose, and work to meet and maintain those standards in accordance with the law.
 - Be subject to stringent security measures to safeguard against unauthorised access and use.
 - Be regularly reviewed and audited to ensure that policies and standards are maintained.
 - Be used only for the purposes for which it is intended, including supporting public safety, protection of pupils and staff and law enforcement.
 - Be accurate and well maintained to ensure information is up-to-date.
- **Access**
 - Requests for access will be handled in accordance with our Data Protection Policy.
 - All disks containing images belong to and remain the property of Avondale primary School. Data handling procedures which are in place to ensure the

integrity of the image information held can be found in our Data Protection Policy.

- Requests by persons outside the school for viewing or copying disks, or obtaining digital recordings, will be assessed by the Headteacher on a case-by-case basis with close regard to Data Protection and Freedom of Information legislation.
- It is important that access to, and disclosure of, the images recorded by CCTV is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved but also to ensure that the chain of evidence remains intact should the images be required for evidential purposes.
- Releasing the recorded images to third parties will be made only in the following limited and prescribed circumstances and to the extent required or permitted by law:
 - **The police** – where the images recorded would assist in a specific criminal inquiry.
 - **Prosecution agencies** – such as the Crown Prosecution Service (CPS).
 - **Relevant legal representatives** – such as lawyers and barristers.
 - Persons who have been recorded and whose images have been retained where disclosure is required by virtue of the Data Protection Act 1998 and the Freedom of Information Act.
- Requests for access or disclosure will be recorded and the Headteacher will make the final decision as to whether recorded images may be released to persons other than the police.

Appendix 1 – Letter and frequently asked questions.

Dear parent/carer,

The school operates a Closed Circuit TV (CCTV) system at Avondale Primary to improve security and ensure the safety of our staff, pupils and visitors whilst on site.

Cameras will be located:

- Across the school site

The system is set up in accordance with the Data Protection Act 1998 and will be used specifically to:

- Maintain a safe environment.
- Ensure the welfare of pupils and staff.
- Deter criminal acts against persons and property.
- Assist the police in identifying persons who have committed an offence.

Our CCTV Policy is available to view upon request and will hopefully alleviate any concerns you have regarding the use of CCTV on the site.

We have put together some frequently asked questions about CCTV and the use of it in our school so that you can be fully informed about the changes.

What is CCTV?

CCTV stands for Closed Circuit Television. CCTV is the term used when cameras are used to capture images. These images are relayed back to a CCTV control room where they are monitored and recorded.

How long are recordings kept for?

Recordings will be kept for 31 days in accordance with the Data Protection Act 1998, after which they are automatically deleted by the system.

How are the police notified of an incident?

A member of the school Senior Leadership Team will contact them by telephone.

How do I get access to CCTV images?

CCTV images of individuals can be applied for by those persons whose images have been captured only under the principles of the Data Protection Act 1998. Access to your own personal information (footage of yourself and no other personal data of anyone else) can be released when you make a Subject Data Access request. This request form has strict criteria around the release of data so that we ensure we do not release your personal data to others.

I've heard some of the CCTV cameras are dummies – is that true?

Avondale does not use dummy CCTV cameras. All cameras will send live images back to the control room.

Is the footage stored on video cassette?

No. All of our system is digitally recorded.

Who do I contact if I have a complaint?

If you have a complaint about the CCTV system or Policy, please direct your complaint as detailed in our Complaints Policy.

We feel that a CCTV system will make Avondale an even better school for your children.