



**CARR JUNIOR
SCHOOL**

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CCTV CODE OF PRACTICE AND USAGE

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CCTV Code of Practice and Usage

A Closed Circuit Television (CCTV) System is installed at Carr Junior School. This system known as the 'Carr Junior School CCTV System' comprises a number of cameras installed at strategic locations. The cameras are fully operational at fixed positions. The system is operated from the office within the school.

Introduction

The monitoring, recording, holding and processing of images of identifiable individuals constitutes personal data as defined by the Data Protection Act 2018 (the Act). This Code of Practice is intended to ensure that in its use of Closed Circuit Television (CCTV), Carr Junior School is fully compliant with the requirements of the Act, with related legislation and with the CCTV Code of Practice published by the Office of the UK Information Commissioner.

1.Data Protection Act 2018

Carr Junior School will comply with the eight principles contained in the Data Protection Act 2018, any associated legislation and any future changes of legislation. The principles are:

Personal data shall be processed fairly and lawfully.

Personal data shall be obtained only for the specified lawful purpose(s).

Personal data shall be adequate, relevant and not excessive in relation to the purpose(s) for which the data is held.

Personal data shall be accurate and, where necessary, kept up to date.

Personal data shall be held for no longer than is necessary.

Personal data shall be processed in accordance with the rights of data subjects.

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss, destruction or damage to personal data.

Personal data shall not be transferred to a country or territory outside the European Economic Area.

2.Definitions

For the purposes of this Code of Practice, the following definitions will apply:

2.1 'School'

Carr Junior School

2.2 'CCTV'

Carr Junior School Closed Circuit Television (CCTV) surveillance systems

2.3 'System'

Carr Junior School Closed Circuit Television (CCTV) surveillance systems

2.4 'Data Controller'

Carr Junior School

3. Ownership and Operation

The CCTV systems, all recorded material and copyright is owned by Carr Junior School. The system is operated by the Site Manager & Office Staff who are employed directly by Carr Junior School. The Site Manager is the officer of the School designated as having responsibility for security matters including the CCTV system and its operation.

3.1 Operators

Operators are members of staff that are authorised to review recorded images in a designated control room. These include:

- HeadTeacher and his/her deputy
- Pastoral Team
- Site Manager

3.2 Monitors

Monitors are members of staff that are authorised to view live video footage at designated monitoring stations.

These include

- Reception Staff

4. Scope

This Code of Practice and Usage Policy is binding on:

- All employees and students of Carr Junior School
- All employees of contracted out services

It also applies to all other persons who may be, for whatever reason, present on Carr Junior School property.

5. The Codes Principles

The following principles will govern the operation of the CCTV systems:

5.1 The CCTV Systems will be operated fairly and lawfully and only for the purposes authorised by Carr Junior School.

5.2 The CCTV Systems will be operated with due regard for the privacy of individuals.

5.3 Any changes to the purposes for which the CCTV Systems are operated will require the prior approval of the Head Teacher and will be publicised in advance of any changes.

6. Purposes of CCTV

CCTV has been installed by Carr Junior School for the following purposes:

- Assist in the prevention and detection of crime.
- Aid in the identification, apprehension and prosecution of offenders in relation to crime.
- Assist with the identification of actions that may result in disciplinary proceedings against staff or students.
- Reduce the fear of crime and to reassure students, staff and visitors.
- Provide the system in a manner that is consistent with respect for individual's privacy.

7. Covert Surveillance

In exceptional and limited circumstances, with the personal written authority of the Head Teacher, his/her deputy and in compliance with the declared purposes and key objectives of the CCTV Systems and the protocols governing the provision of evidence, CCTV Systems may be used for covert and targeted observation.

8. Signage

Visible and legible signs indicating the operation of CCTV Systems have been placed at all common entrances to the School. These signs indicate:

- The presence of CCTV equipment.
- The reasons for the CCTV equipment.
- Ownership of the CCTV equipment.
- Contact details.

9. Installation

All installations connected with the CCTV systems are appropriate to its purpose and to the requirements of this Code of Practice and Usage Policy. Cameras and equipment have been installed in such a manner as not to overlook private areas adjoining the Schools boundaries.

10. Maintenance

Maintenance of the CCTV system will be carried out every year to ensure that it is operating in accordance with its purpose. A maintenance is carried out by G&B York. Regular checks of the date and timestamp of video footage will be carried out by the staff.

11. Processing Data

The processing of data is carried out under strict accordance with the Data Protection Act 2008. Access to, and disclosure of images is restricted and carefully controlled to safeguard the rights of individuals and ensure that evidence remains intact, should the images be required for evidential purposes.

12. Retention and use of recorded material

In accordance with the fifth principle, recorded material will not be kept for longer than the purpose for which it is being retained.

12.1 Images recorded to DVR will not be held for more than 14 days.

12.2 Images recorded to removable media will not be held for longer than the purpose for which it is being retained.

12.3 Removable media will be stored in the data safe located in the Cash Office. Recorded images will not be removed from the Control Room unless exported to removable media to be reviewed by authorised operators, data subjects or third parties.

12.4 Still photographs will be generated from recordings made by the system only where these are required for evidential purposes by the School, the police or other bodies with prosecuting powers. No copies will be made for any other purpose.

12.5 Unless required to do so by a court of law, recordings made by the system and/or still images generated from such recordings will not normally be made available by the School to individuals wishing to use them as evidence in civil litigation.

12.6 Carr JuniorSchool reserves the right to use a recording made by the system and/or still images generated from such recordings in any civil prosecution brought by the School.

12.7 Where appropriate, the police may be asked to investigate any matter recorded by the CCTV system which appears to indicate staff involvement and is deemed to be of a potential criminal nature. Such material will only be authorised for use in possible staff or student disciplinary hearings following approval from the Head Teacher or his/her deputy.

13. Disclosure of Data

The Freedom of Information Act (2000) and the Data Protection Act 2008 will be strictly adhered to in handling requests for disclosure of personal data. Requests under either Act must be made to the Site Manager, who will consult as necessary with the Head Teacher or Deputy as required.

14. Requests by a Data Subject

Individuals have the right to access their personal data, which includes images captured by CCTV systems. The data subject will be asked whether they would be satisfied with merely viewing the images

recorded but if they wish to have copies of their personal data then any such request should be made to the Head Teacher or his/her deputy and submitted with the following:

- a completed subject access form which gives details of the dates and times when they visited the School and their location e.g. which entrance was used or the specific area of a building.
- two photographs of the data subject - one full face, one side view provided with the completed access form.
- proof of the data subject's identity e.g. driving licence or passport.
- a cheque (made payable to Carr Junior School) or cash to the sum of £10 for which a receipt will be issued at the time the form is received.

The School is not obliged to comply with the request unless it is supplied with the required documentation, is satisfied as to the identity of the data subject and can locate the personal data which the subject is seeking.

Where the School cannot comply with the request without disclosing the image of another identifiable individual it is not obliged to do so unless:

- the other individual has consented to the disclosure of the information to the person making the request, or
- it is reasonable in all the circumstances to comply with the request without the consent of the other individual. A written decision on the request will be sent to the data subject within 21 days and if access to the images is to be provided, such access will be given within 40 days of the School receiving the request or if later, the date when the School receives the complete set of documentation and the required fee from the data subject. If images are to be made available to a Data Subject via removable media the Data Subject must make arrangements to collect the media at the School from an authorised member of staff.

15. Requests by a Third Party

Requests from third parties e.g. law enforcement agencies to view personal data captured by the CCTV system are to be treated as freedom of information requests. They are likely to be made for any one or more of the following purposes:

- providing evidence to assist in criminal proceedings
- providing evidence for civil proceedings or tribunals
- the investigation and detection of crime
- identification of witnesses
- illegal or unauthorised activity in/on School car parks.

Third parties who should be required to show adequate grounds for disclosure of data within the above criteria, may include, but are not limited to:

- Police
- Statutory authorities with powers to prosecute
- Solicitors
- Plaintiffs in civil proceedings

- Accused persons or defendants in criminal proceedings.

Requests for information must be submitted to the Head Teacher or his/her deputy. Police and other authorities' requests must be accompanied by their relevant Data Protection form duly signed by the appropriate authority, while other third parties will be required to submit their requests on headed notepaper. All those seeking disclosure should give:

- the authority under which the request is made
- reasonable proof of the requester's personal identity and organisational affiliation e.g. police officers will be expected to quote their identification numbers and/or produce their warrant cards
- details of the nature of the personal data requested and the purpose for which it is being requested
- the relevant DPA exemption or other legislation which authorises the School to release the information
- a warranty that it will be held and processed in conformity with the Data Protection Principles

The Head Teacher or his/her deputy will ensure:

- No undue obstruction of any third party investigation to verify existence of data
- The retention of data which may be relevant to a request
- That there is no connection with any existing data held by the police in connection with the same investigation
- The request is responded to within 20 working days

16. Control Rooms

CCTV images will be captured in the office. CCTV images will be monitored the Office, at Reception. Access to the monitoring and recording facilities will be prohibited except for lawful, proper and sufficient reasons and only by staff outlined in this Code of Practise and Usage Policy or by law enforcement or inspection agencies and only then with the personal authority (verbal or written) of the Head Teacher, his/her deputy. Any such visits will be conducted and recorded in accordance with School security procedures.

Regardless of status, all persons visiting the Control Room with the purpose of viewing recorded data will be required to sign the visitor's book and a declaration of confidentiality. Any other personnel admitted to the Control Room, such as cleaning staff or engineers effecting repairs, must be authorised by the Head Teacher, his/her deputy (verbally or written) and will be supervised at all times whilst they are in the Control Room.

Keys to allow entry to the Control Room and access to the CCTV Data Safe will be held by:

- The Headteacher
- The Site Manager

17. Major Incidents

In the event of a major incident, such as bomb threats, explosions, serious fires, terrorism and/or serious public disorder, the police authorities will be authorised to access the CCTV Control Room and make use of CCTV facilities. Such action will be agreed and authorised by the Head Teacher or his/her deputy.

18. Complaints

The Head Teacher is responsible for the operation of the CCTV system and in the first instance, for ensuring compliance with this Code of Practice and Usage Policy. Any use of the CCTV system or recorded data that is not in compliance with this Code and is inconsistent with the objectives of the system will be considered to be in breach of Carr Junior School policy. If any breach of this kind constitutes an offence under criminal or civil law then court proceeding may be commenced. Persons found misusing the system may be subject to Carr Junior School disciplinary procedures. Complaints regarding misuse of the CCTV system will be treated seriously and dealt with in accordance with Carr Junior School complaints procedures. Any concerns in respect of the system's use or regarding compliance with this Code should be addressed to the Head Teacher, in the first instance who will provide a written acknowledgement within seven working days.

19. Monitoring and Review

This CCTV Code of Practice will be kept under continuous review. Any questions about its interpretation or operation should be referred to the Head Teacher.

20. Public Information

A copy of this Code of Practice and Usage Policy is available on request and is also published on the school website at www.carrjunior.co.uk

A copy of the CCTV Code of Practice (Revised Edition 2008) is available on request and is also published on the Information Commissioner's Office (ICO) website at www.ico.gov.uk

Any potential misuse of the system and/or breach of the data protection act that may occur as a result of failing to adhere to any of the rules/guidelines outlined in this document could result in criminal prosecution.