

PORTFIELD SCHOOL & SATELLITE CENTRES



POLICY DOCUMENT FOR USE OF CCTV



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Review of Policy

This policy will be reviewed annually unless changes of circumstances or legislation requires it to be amended earlier.

Signed: Date:
Headteacher

Signed: Date:
Chair of Governors

Portfield School Mission Statement

Working together Learning together Achieving together

At Portfield School we strive to

- Create a happy, safe, supportive and stimulating learning environment
- Value everyone
- Develop everyone's personal, social, emotional health and wellbeing
- Promote relevant academic and vocational skills
- Meet individual needs through an imaginative and flexible approach
- Enable all learners to achieve their full potential

UNCRC United Nations Convention on the Rights of the Child

- Portfield School places the values and principles of the UNCRC at the heart all policies and practices
- Portfield School is a Rights Respecting School

POLICY FOR THE USE OF C.C.T.V. SYSTEMS AT PORTFIELD SCHOOL

This policy sets out the Code of Practice issued by Portfield School Governing Body. It is intended to provide guidance as to good practice for users of the CCTV (closed circuit television) systems at PORTFIELD SCHOOL.

This code is based upon the Code of Practice published by the Information Commissioner, which set out the standards that must be met if the requirements of the Data Protection 1998 Act is to be met. These are listed below:

Data should be:

- * *Fairly and lawfully processed;*
- * *Processed for limited purposes and not in any manner incompatible with those purposes;*
- * *Adequate relevant and not excessive;*
- * *Accurate;*
- * *Not kept for longer than is necessary;*
- * *Processed in accordance with individuals' rights;*
- * *Secure;*
- * *Not transferred to countries without adequate protection.*

CCTV SYSTEMS

1. Owner Operator Data and Controller of the Scheme – S. Painter, Headteacher, Portfield School, Portfield, Haverfordwest, Pembrokeshire SA61 1BS.
2. PORTFIELD SCHOOL considers CCTV Scheme can contribute to security and the health and safety of pupils, staff and visitors.
3. The purposes of the CCTV Scheme in PORTFIELD SCHOOL are to provide monitoring systems to assist with the protection of the public property, law enforcement, traffic management, community safety, the reduction of crime and disorder; thereby improving the quality of life for the public in general.
4. CCTV systems in PORTFIELD SCHOOL have been notified to the Information Commissioner, Registration Number: Z5332645
5. The general management of CCTV in PORTFIELD SCHOOL is currently vested with the Site manager, Mr Gareth Wilcox.
6. The day-to-day management of the CCTV system will be the responsibility of the Caretaker.
7. The CCTV system is serviced annually by nominated PCC contractor.

Siting the Cameras

The Governing Body Buildings and Finance Committee has considered the proper location of CCTV cameras, where they exist, in and around Portfield School. The

location of the cameras is based upon a variety of information including security and health and safety.

Standards

1. All such CCTV equipment installed in PORTFIELD School will only be sited in such a way that it only monitors those spaces that are intended to be covered by the equipment.
2. If domestic areas such as gardens or areas not intended to be covered by the scheme border those spaces which are intended to be covered by the equipment, then the users should consult with the owners of such spaces if images from those spaces might be recorded. In the case of back gardens, this would be the resident of the property overlooked.
3. The employees and pupils will be made aware of the purpose (s) for which the scheme has been established and notices to this effect will be displayed in school reception areas.
4. The operators will only use the equipment in order to achieve the purpose(s) for which it has been installed.
5. Cameras that are adjustable by the operators will not be adjusted or manipulated by them to overlook spaces which are not intended to be covered by the scheme, other than as described in 6 below.
6. If it is not possible physically to restrict the equipment to avoid recording images from those spaces not intended to be covered by the scheme, then operators will be trained in recognising the privacy implications of such spaces being covered.
7. Signs, of no less than the minimum standard (150mm x 210mm – A5) will be placed so that the public are aware that they are entering a zone that is covered by CCTV.
8. The signs should be clearly visible and legible to members of the public.
9. The size of signs will vary according to circumstances.
10. The signs should contain the following information:
 - a. *Identity of the person or organisation responsible for the scheme;*
 - b. *The purposes of the scheme;*
 - c. *Details of whom to contact regarding the scheme;*
 - d. *Any other information that may become a statutory requirement.*

Quality of Images

Standards

1. Upon installation an initial check will be undertaken to ensure that the equipment performs properly. Regular checks will be made thereafter to ensure that the system is operating properly.

2. Only good quality tapes/hard drives of a type recommended as suitable for use with the recording equipment installed will be used.
3. The medium on which the images are captured should be cleaned (degaussed) so that images are not recorded on top of images recorded previously.
4. The medium of which the images have been recorded should not be used when it has become apparent that the quality of images has deteriorated or the tape has become damaged. Once the usage of the tape is no longer appropriate, subject to retention policies and needs, it should not be kept for more than 30 or 31 days unless they are being used for criminal persecution or the like.
5. Checks will be made to ensure the accuracy of any features such as the location of the camera and/or date and time reference., Where the time/date etc are found to be out of sync with the current time/date, the operators will take such remedial action as is contained in the operations manual to correct the error. A note of such changes will be recorded.
6. Cameras will only be situated so that they will capture images relevant to the purpose for which the scheme has been established.
7. When installing cameras, consideration must be given to the physical conditions in which the cameras are located.
8. Cameras are to be properly maintained and serviced to ensure that clear images are recorded. Servicing will be carried out at least annually.
9. Cameras should be protected from vandalism in order to ensure that they remain in working order.
10. A maintenance log will be kept in the monitoring centre of the system concerned.
11. The school's caretaker will be:
 - a. *The person responsible for making arrangements for ensuring that a damaged camera is fixed;*
 - b. *Ensuring that the camera is fixed within a specific time period;*
 - c. *Monitoring the quality of the maintenance work,*

Processing the Images

Standards

1. Images should not be retained for longer than is necessary and unless required for specific investigation or evidential purposes, deleted after 31 days have passed.
2. Once the retention period has expired, the images should be removed or erased.

3. Images that are to be retained for evidential purposes will be retained in a secure place to which access is controlled.
4. Monitors displaying images from areas in which individuals would have an expectation of privacy should not be viewed or be capable of being viewed by anyone other than authorised persons.
5. Access to the recorded images should be restricted to a manager or designated member of staff who will decide whether to allow requests for access.
6. Viewing of the recorded images should take place in a restricted area, for example, in the headteacher's office. Other employees should not be allowed to have access to that area when a viewing is taking place.
7. Removal of the medium on which images are recorded, for viewing purposes, should be documented as follows: (Appendix A)
 - a. *The date and time of removal;*
 - b. *The name of the person removing the images;*
 - c. *The name(s) of the person(s) viewing the images;*
 - d. *The reason for the viewing;*
 - e. *The outcome, if any, of the viewing;*
 - f. *The date and time the images were returned to the system or secure place, if they have been retained for evidential purposes.*
8. All operators and employees with access to images should be aware of the procedure that needs to be followed when accessing the recorded images.
9. All operators should be trained in their responsibilities under the Code of Practice, i.e. the Headteacher will delegate to the appropriate personnel access to recorded images.

Access to and disclosure of images to third parties

Standards

All employees should be aware of the restrictions set out in this code of practice in relation to access to, and disclosure of, recorded images.

1. Access to recorded images will be restricted to those persons who need to have access in order to achieve the purpose(s) of using the equipment.
2. All access to the medium on which the images are recorded should be documented.
3. Disclosure of the recorded images to third parties should only be made in limited and prescribed circumstances. Subject to paragraph 1 above, in disclosure will be limited to the following classes of

persons/agencies.

- * *Law enforcement agencies, where the images recorded would assist in a specific enquiry;*
 - * *Highways authorities in respect of traffic management matters;*
 - * *Law enforcement agencies where the images would assist a specific criminal enquiry;*
 - * *Prosecution Agencies;*
 - * *Relevant legal representatives*
4. All requests for access or for disclosure should be recorded, if access or disclosure is denied, the reason should be documented,
 5. If access to or disclosure of the images is allowed, then the following will be documented. (Appendix B)
 - a. *The date and time at which access was allowed or the date on which disclosure was made;*
 - b. *The identification of any third party who was allowed access or to whom disclosure was made;*
 - c. *The reason for allowing access or disclosure;*
 - d. *Location of the images*
 - e. *Any crime incident number to which images may be relevant*
 - f. *Signature of person authorised to collect the medium – where appropriate.*
 6. Recorded images will not be made more widely available – for example they should not be routinely made available to the media or placed on the internet.
 7. If it is intended that images will be made more widely available, that decision should be made by the Headteacher or designated member of staff and the reason for that decision should be documented.
 8. If it is decided that images will be disclosed to the media (other than in the circumstances outlined above), the images of individuals will need to be disguised or blurred so that they are not readily identifiable.

Access by data subjects

Standards

1. In accordance with Section 7 of the Data Protection Act 1998 (Subject Access), an individual who believes that their image has been captured by this scheme is entitled to make a written request to the Data Controller Upon payment of the current fee*, and the supply of essential information, a systems search will be conducted and subject to certain conditions, the individual will be allowed access to the personal data held (The current maximum fee is £10.00 and may be reviewed)
2. All subject access requests should be referred in the first instance to the Headteacher who will liaise with the Site Manager.

3. All staff involved in operating the equipment must be able to recognise a request for access to recorded images by data subjects and how such requests are to be dealt with
4. Data subjects should be provided with a standard subject access request form, a copy of this form is attached at appendix C, which:
 - a. *Indicates the information required in order to locate the images requested;*
 - b. *Indicates the information required in order to identify the person making the request;*
 - c. *Indicates the fee that will be charged for carrying out the search for the images requested.*

NB. The above form will also enquire whether the individual would be satisfied with merely viewing the images recorded. The form will also indicate that the response will be provided promptly and in any event within 7 days of receipt as the images are only held for 7 days.

5. Individuals, at the time of any subject access request, will be given a description of the type of images recorded and retained and the purpose for which the recording and retention takes place. They should be informed of their rights as provided by the 1998 Act,
6. Prior to any authorised disclosure, the Headteacher will need to determine whether the images of another “third party” individual features in the personal data being applied for and whether these third party images are held under a duty of confidence,
7. If third party images are not to be disclosed the System Manager shall arrange for the third party images to be disguised or blurred,
8. If the Headteacher decides that a subject access request from an individual is not to be complied with, the following should be documented:
 - a. *The identity of the individual making the request;*
 - b. *The date of the request;*
 - c. *The reason for refusing to supply the images requested;*
 - d. *The name and signature of the person making the decision.*

Other rights

Under the Data Protection Act individuals also have the following rights which may be applicable to CCTV schemes:

- i. *Right to prevent processing likely to cause damage or distress;*
- ii. *Rights in relation to automated decision taking;*
- iii. *Right to seek compensation for failure to comply with certain*

requirements.

Where a request is made in relation to other rights, these shall be referred to the Headteacher who will document the request and respond to it.

Monitoring compliance with this code of practice

Standards

1. The contact point indicated on the sign should be available to members of the public during normal office hours. Employees staffing that contact point should be aware of the policies and procedures governing the use of this equipment.
2. Enquirers should be provided on request with one or more of the following:
 - *A copy of this policy.*
 - *A subject access request form if required or requested; Appendix C*
 - *The complaints procedure to be following if they have concerns about the use of the system.*
3. An internal annual assessment should be undertaken which evaluates the effectiveness of the system by the caretaker.
4. De-personalised details of complaints will be maintained and included in the agenda of the buildings and Finance Governing Body Sub-Committee meeting if appropriate.
5. A copy of the complaints procedure will be made available upon request from the School Secretary.

APPENDIX A

C.C.T.V. – PORTFIELD SCHOOL

RECORDING OF VIEWING BY AUTHORISED SCHOOL STAFF

Date and Time of Removal of Video Tape:/ Viewing DVR recorder

Date: Time:

Name of Persons Viewing the Tape:

Name

Designation

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

Reason for the viewing:

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Outcome, if any, of the viewing:

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Date and time the tape was returned to the system:

Date: Time:

APPENDIX B

C.C.T.V. – PORTFIELD SCHOOL

RECORDING OF VIEWING BY THIRD PARTY (e.g. Police)

Date and Time Access Allowed:

Date: **Time:**

Identification of any third party who was allowed access:

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Names of school staff present:

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Reason for allowing access:

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.....

Crime incident number if applicable:

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Location of the images:

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Signature of the person authorised to collect the medium – where appropriate:

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Date and time the tape was returned to the system or if retained for evidential purposes:

Date: **Time:**

APPENDIX C

C.C.T.V. – PORTFIELD SCHOOL

FORM TO REQUEST ACCESS TO CCTV IMAGES – FEE £10.00

NAME:

ADDRESS:
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.....
.....

DATE OF BIRTH:

TELEPHONE NUMBER:

Date image recorded:

Time image recorded:

Location:

I agree to merely viewing the requested images.

To carry out a search for the images, a fee of £10.00 will be charged.

Please complete the above form and attach a £10.00 cheque made payable to Portfield School

The Headteacher will consider the request and respond within 7 days of receipt as the images are only held for 7 days.

CCTV

Purposes of CCTV scheme in Portfield School are:

To assist with the protection of

- Public Property
- Law Enforcement
- Traffic Management
- Community Safety
- Reduction of Crime and Disorder

General Management of CCTV is vested with:

- Mr Gareth Wilcox – Site Manager

Owner Operator Data and Controller of Scheme

- Mrs Sue Painter – Headteacher
Portfield School - 01437 762701