Introduction

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at WSAPC units hereafter referred to as 'the school'. The system comprises a number of cameras located around the school sites. Cameras are monitored by a selected member of senior staff.
This policy follows Data Protection Act guidelines and will be subject to review annually to include consultation as appropriate with interested parties.
The CCTV system is owned by the school.

1 Objectives of the CCTV scheme

- To protect the school buildings and their assets
- To increase personal safety and reduce the fear of crime
- 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.

2 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. The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act. Cameras will be used to monitor activities within the school, 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 an authorisation being obtained using the school's forms for Directed Surveillance 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 have been placed at all access routes to areas covered by the school CCTV.

3 Operation of the system

The scheme will be administered and managed by the Heads of School, in accordance with the principles and objectives expressed in the code. The day-to-day management will be the responsibility of both the Senior Leadership Team (SLT), the Heads of School and the selected senior individuals as identified within this policy The CCTV system will be operated 24 hours each day, every day of the year.

4 Control

The selected individuals will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.
Access to the CCTV images will be strictly limited to the SLT, Heads of School and selected individuals. Unless an immediate response to events is required, staff monitoring CCTV must not direct cameras at an individual or a specific group of individuals.
All stakeholders wishing to view CCTV images will be subject to particular arrangement as outlined below. Selected individuals must satisfy themselves over the identity of any stakeholders requesting access to areas where images can be viewed and the purpose of the visit. Where any doubt exists access will be refused.
The system may generate a certain amount of interest. It is vital that operations are managed with the minimum of disruption. Casual visits where images can be viewed will not be permitted. Visitors must first obtain permission from the Head of School / Nominated Officer and must be accompanied throughout the visit.
Access to the images must be secure and when not the room must be kept secured (if relevant) Passwords to computers where access is granted must be kept secure.
Other administrative functions may include maintaining recordings and hard disc space, filing and maintaining occurrence and system maintenance logs.
Emergency procedures will be used in appropriate cases to call the Emergency Services.

5 Liaison

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

6 Monitoring procedures

Camera surveillance must be maintained at all times.
If covert surveillance is planned, it can only be undertaken by the police or the Council using the appropriate authorisation forms.

7 Video recordings procedures

In order to maintain and preserve the integrity of the recordings 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:

- Each recording storage must be identified by a unique mark.
- Before using, each recording storage must be cleaned of any previous recording.
- The controller must register the date and time of storage device nsert, including device reference and type (USB, DVD etc)..
- A recording required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence store. If a recording 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 store.
- If the recording is archived the reference must be noted.
- Images stored will be for a maximum retention period of 14 days only.

Recordings may be viewed by the police for the prevention and detection of crime and authorised officers of the Council. 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 the above bullet points of section 8 of this Code. Recordings will only 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. On occasions when a Court requires the release of an original recording, this will be produced from the secure evidence store, complete in its sealed bag.
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.
Applications received from outside bodies (for example solicitors) to view or release recordings will be referred to the Headteacher. 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.

8 Breaches of the code (including breaches of security)

Any breach of the Code of Practice by school staff will be initially investigated by the Headteacher, to enable him 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.

9 Assessment of the scheme and code of practice

Performance monitoring, including random operating checks, may be carried out by the Data Protection Officer.

10 Complaints

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

11 Access by the data subject

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. Requests for data subject access should be made on an application form available from the Executive Headteacher.

12 Public information

Copies of this Code of Practice will be available to the public from the School Office, school website.

Summary of Key Points

- This Code of Practice will be reviewed annually.
- The CCTV system is owned and operated by the school.

- The 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 will be properly indexed, stored and destroyed after appropriate use.
- Recordings may only be viewed by authorised Council and school officers, Control Room staff 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.
- Recordongs will be disposed of securely by incineration.
- Any breaches of this code will be investigated by the Headteacher. An independent investigation will be carried out for serious breaches.
- Breaches of the code and remedies will be reported to the Headteacher.
- Images stored will be for a maximum retention period of 14 days only.

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