

# Great Orton Primary School

## CCTV Policy



Name of school	Date of approval	Date of review (2 years)
Great Orton Primary School	25/11/2022	Nov 2024

Name	Signed	Date
Headteacher		25/11/2022

## AMENDMENT RECORD

Version	Date	Description

# Contents

Introduction .....	4
Objectives of the CCTV system .....	4
Operation of the system .....	4
Control room .....	5
Signage.....	6
Monitoring procedures .....	6
Covert surveillance .....	7
Storage and retention of recorded images .....	7
Breaches of the policy (including breaches of security) .....	8
Assessment of the scheme and code of practice .....	<b>Error! Bookmark not defined.</b>
Complaints.....	8
Access by the data subject.....	8
Public information .....	8
Summary of key points.....	8
Useful links .....	9
CCTV system – Maintenance checklist .....	10
Sample CCTV privacy notice .....	11

## Introduction

The purpose of this policy is to regulate the use of Closed Circuit Television and its associated technology in the monitoring of both the internal and external environs of: Great Orton Primary School (hereafter referred to as '*the school*').

CCTV can be installed internally and externally in the premises for the purpose of enhancing the security of the building and its associated equipment, as well as creating a mindfulness among the occupants at any one time that a surveillance security system is in operation within and/or in the external environs of the premises during both the daylight and night hours each day.

This policy applies to all personnel, and relates directly to the location and use of CCTV, the monitoring, recording and subsequent use of recorded materials:

- the CCTV system is owned and operated by the school;
- the system comprises a number of fixed and dome cameras located around the school site;
- all cameras are monitored from a central control room and are only available to selected senior staff on the Administrative network;
- <sup>1</sup>this policy follows [Data Protection Act 2018](#) guidelines and is subject to [GDPR \(General Data Protection Regulations\)](#).

## Objectives of the CCTV system

The school has decided that CCTV is necessary for the prevention and detection of crime and to:

- protect the school buildings and assets during and after school hours;
- promote the health and safety of staff, pupils and visitors;
- support the police in a bid to deter and detect crime;
- assist in identifying, apprehending and prosecuting offenders;
- protect members of the public and private property;
- ensure that school rules are respected so that the school is properly managed.

## Operation of the system

- The CCTV system will be registered with the Information Commissioner under the terms of the Data Protection Act 2018 and will seek to comply with the requirements of the [Surveillance Camera 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 Data Protection Act.
- Risk assessments for new installations will be carried out and risk assessments for existing systems will be reviewed at regular intervals.
- The system will be administered and managed by the headteacher, in accordance with the principles and objectives expressed in this policy.

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<sup>1</sup> Cumbria County Council supports the objectives of the UK General Data Protection Regulation (UKGDPR) and Data Protection Act 2018 (DPA) and seeks to ensure compliance with this data protection legislation.

- The school will maintain a list of all CCTV assets including all maintenance documentation. See [CCTV Maintenance checklist](#).
- Day-to-day management will be the responsibility of the headteacher.
- The CCTV system will be operated 24 hours each day, every day of the year.
- Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Data will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Data will never be released to the media for purposes of entertainment.
- The planning and design of the system will 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.
- Consideration will be given to both staff and pupils regarding possible invasions of privacy and confidentiality due to the location of a particular CCTV camera or associated equipment.
- The headteacher will approve the temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events. (The term 'temporary cameras' does not include mobile video equipment or hidden surveillance cameras used for criminal investigations).

## Control room

- Access to the CCTV control room will be strictly limited to the SMT. In our school the control room is located in the school office.
- The headteacher will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.
- 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.
- Visitors and other contractors wishing to enter the control room will be subject to particular arrangements as outlined below:
  - visitors must first obtain permission from the system manager or his/her deputy and must be accompanied by him/her throughout the visit. Casual visits will not be permitted.
  - full details of visitors including time/data of entry/exit, and the purpose of the visit will be recorded in the visitors' book kept in the control room. If there is any doubt to the identity or purpose of the visit, access will be refused.
  - if out-of-hours emergency maintenance arises, the control room operators must be satisfied of the identity and purpose of contractors before allowing entry.

- any visit may be immediately curtailed if prevailing operational requirements make this necessary.
- There must always be at least one control room operator present within the control room out of hours and weekends **OR** the control room must be locked. During the working day when not manned the room must be kept secured.
- Other administrative functions will include maintaining video data 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.

## Signage

Warning signs, as required by the Information Commissioner's Surveillance Camera Code of Practice, have been placed at all access routes to areas covered by the school CCTV. Signage will:

- be clearly visible and readable;
- contain details of the organisation operating the system, the purpose for using the system and who to contact about the scheme;
- include basic contact details such as a telephone number, web address, or email contact details.

## Monitoring procedures

- Monitoring for security purposes will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies and personnel for other purposes is prohibited, e.g. monitoring of political or religious activities, or employee and/or pupil evaluations that would undermine the acceptability of the resources for use regarding critical safety and security objectives.
- Cameras will be used to monitor activities within the school grounds 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.
- <sup>2</sup>CCTV monitoring of public areas, for security purposes, will be conducted in line with the Surveillance Camera Code of Practice in a manner consistent with all existing policies adopted by the school including discrimination, bullying and harassment, sexual harassment etc.
- The Surveillance Camera Code of Practice for video monitoring prohibits monitoring based on the characteristic and classification contained in equality and other related legislation, e.g. race, gender, sexual orientation, national origin, disability etc.

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<sup>2</sup> The Surveillance Camera Code of Practice for video monitoring prohibits monitoring based on the characteristic and classification contained in equality and other related legislation, for example race, gender, sexual orientation, national origin, disability etc.

- <sup>3</sup>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 Powers Act 2000, Section 28](#) .
- When a zoom facility on a camera is being used, a second person will be present with the camera operator to guarantee that there is no unwarranted invasion of privacy.

## Covert surveillance

- The school will not engage in covert surveillance.
- Certain law enforcement agencies may request to carry out covert surveillance on school premises. Such covert surveillance may require a Court Order. Accordingly, any such request made by law enforcement agencies will be requested in writing.

## Storage and retention of recorded images

- Supervising the access and maintenance of the CCTV System is the responsibility of the headteacher. The headteacher may delegate the administration of the CCTV system to another staff member.
- To ensure the rights of individuals recorded by surveillance systems are protected, recorded material will be stored in a way that maintains the integrity of the information on the system's hard drive and where necessary, encrypted. The material will be kept secure, and passwords will not be disclosed. Access to recorded material is restricted to the senior leadership team. A log of access will be kept by the headteacher.
- Data may be viewed by the police for the prevention and detection of crime, authorised officers of Cumbria County Council for supervisory purposes, authorised demonstration, and training.
- A record will be maintained of the release of data to the police or other authorised applicants. A register will be available for this purpose.
- Viewing of data by the police must be recorded in writing and in the log book. Requests by the police can only be actioned under the terms of the Data Protection Act 2018.
- The police may require the school to retain the stored data for possible use as evidence in the future. Such data will be properly indexed and properly and securely stored until needed by the police.
- Applications received from outside bodies (e.g. solicitors) to view or release data will be referred to the headteacher. In these circumstances data 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

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<sup>3</sup> Includes private homes, gardens and other areas of private property.

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.

## Breaches of the policy (including breaches of security)

- Any breach of the policy by school staff will be initially investigated by the headteacher, in order for him/her to take the appropriate disciplinary action.
- Any serious breach of the policy will be immediately investigated, and an independent investigation carried out to make recommendations on how to remedy the breach.
- Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school, or a pupil.

## Complaints

- Any complaints about the school's CCTV system should be addressed to the headteacher.
- Complaints will be investigated in accordance with breaches of the policy (see above).

## <sup>4</sup>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 on an application form available from the headteacher.

## Public information

- Copies of this policy will be available to all staff, visitors and members of the public from the school office and the headteacher.

## Summary of key points

- This policy will be reviewed every two years.
- The CCTV system is owned and operated by the school.
- The control room will not be manned out of school hours.
- 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.
- Recording data will be properly indexed, stored and <sup>5</sup>destroyed after appropriate use.
- Data may only be viewed by authorised school officers, control room staff and the police.

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<sup>4</sup> The Council will endeavour to promote greater openness, provide increased transparency of data processing and build trust and confidence in the way personal data is managed [GDPR compliance policy](#). ([cumbria.gov.uk](#)) .

<sup>5</sup> Police recommend that data is kept for up to 31 days then deleted



- Data required as evidence will be properly recorded witnessed and packaged before copies are released to the police.
- Data will not be made available to the media for commercial or entertainment.
- Data will be disposed of securely by incineration.
- Any breaches of this policy will be investigated by the headteacher. An independent investigation will be carried out for serious breaches.
- Breaches of the policy and remedies will be reported to the headteacher.

## Useful links

[Data Protection Act 2018](#)

[GDPR \(General Data Protection Regulations\)](#)

[Guide to the UK General Data Protection Regulation \(UK GDPR\) | ICO](#)

[Surveillance Camera Code of Practice](#)

[Data protection impact assessments for surveillance cameras](#)

[Regulation of Investigatory Powers Act 2000, Section 28](#)

[GDPR compliance policy \(cumbria.gov.uk\)](#)

## CCTV system – Maintenance checklist

	<b>CCTV SYSTEMS</b>	<b>Y/N</b>	<b>COMMENTS</b>
<b>Camera lens</b>			
1.	Is the camera lens focused and adjusted properly?	Y	
2.	Is the camera lens free from marks or dust and free from overhanging foliage?	Y	
3.	Has the camera casing been knocked and therefore not pointing to the correct location?	N	
4.	Are all cameras securely attached to walls?	Y	
5.	If motion sensors are installed, are they working?	Y	
6.	Are the zoom and pan functions working correctly?	Y	
<b>Wiring</b>			
7.	Are there any signs of wear and tear of exposed wires?	N	
8.	Are there any loose wires?	N	
9.	Is there clear transmission of picture with no distortion?	Y	
<b>Monitors</b>			
10.	Are the monitors showing a clear picture and the brightness and contrast settings correctly adjusted?	Y	
11.	Are all switches and individual equipment fully functioning?	Y	
12.	Are monitors and equipment free from dust and grime?	Y	
13.	Have cables leading from the equipment been checked and are in good condition?	Y	
14.	Is the correct time and date stamp set?	Y	

**24 hour CCTV in operation**



**Images are being monitored for the  
purposes of crime prevention  
and public safety.**

**This scheme is controlled by:**

**Great Orton Primary School**

**For more information contact:**

**Tel 01228 711602 or Email [head@greatorton.cumbria.sch.uk](mailto:head@greatorton.cumbria.sch.uk)**