



YSGOL  
**PENRHYN**  
**DEWI VA**

# **CCTV SYSTEM POLICY**

**Adopted by Governing Body**

**October 2022**

## **Ysgol Penrhyn Dewi VA CCTV System Policy**

### **1. Introduction**

1.1 The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system on the relevant Ysgol Penrhyn Dewi VA sites. Ysgol Penrhyn Dewi VA will be hereafter referred to as 'the school'. CCTV cameras are located on the Dewi campus (both internally and externally) and on the Non campus (externally).

1.2 The system comprises a number of fixed and dome cameras located around the school sites. All cameras are monitored from a Central Control Room in the case of Dewi campus and from a secure storage room in Non campus and are only available to selected staff on the Administrative Network

1.3 This Policy follows UK General Data Protection Regulation (UK GDPR) Data Protection Act guidelines.

1.4 The Policy will be subject to review bi-annually to include consultation as appropriate with interested parties.

1.5 The CCTV system is owned by the school.

### **2. Objectives of the CCTV scheme**

- 2.1 (a) To protect the school occupants, buildings and their assets
- (b) To increase personal safety and reduce the fear of crime
- (c) To support the Police in a bid to deter and detect crime
- (d) To assist in identifying, apprehending and prosecuting offenders
- (e) To protect members of the public and private property
- (f) To assist in managing the school
- (g) To address any concerns regarding the safeguarding of pupils

### **3. Statement of intent**

3.1 The CCTV Scheme will be registered with the Information Commissioner under the terms of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018) and will seek to comply with the requirements of the UK GDPR Article 6, the Data Protection Act and the Commissioner's Code of Practice.

3.2 The school will protect the system and all information, documents and recordings obtained and used as data which are covered by the relevant Acts.

3.3 Cameras will be used to monitor activities within the school and its sites, including public areas, to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school, together with its visitors.

3.4.1 Static cameras are focused on areas of school activity only.

3.4.2 Unless in response to an immediate events, 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.

3.5 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Images/Media will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Images/Media will never be released to the media for purposes of entertainment.

3.6 The planning and design has endeavoured to ensure that the CCTV 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.

3.7 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.

3.8 The lawful basis for using the surveillance camera system is GDPR Article 6(1)(f): Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. Legitimate interest is in relation to safeguarding of pupils and staff, prevention and detection of crime, protection of school and PCC property.

#### **4. Operation of the system**

4.1 The Scheme will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in the code.

4.2 The day-to-day running of the system will be carried out by the Business Manager during the day, out of hours and at weekends.

4.3 The Control Rooms will only be staffed by the Business Manager or a nominated Deputy.

4.4 The CCTV system will be operated 24 hours each day, every day of the year.

4.5 The CCTV Provider is the current Pembrokeshire County Council Contractor. They do not have access to footage other than when they are accessing the system during scheduled maintenance or servicing within the school building.

#### **5. Control Room**

5.1 The Business Manager or nominated representative will regularly check and confirm the efficiency of the system and in particular that the equipment is properly recording and that cameras are functional.

5.2 Access to the CCTV Control Room will be strictly supervised by the Business Manager.

5.3 Unless in response to an immediate event, staff in the CCTV Control Room must not direct cameras at an individual or a specific group of individuals.

5.4 Visitors and other contractors wishing to enter the Control Room will be subject to particular arrangement as outlined below.

5.5 Control Room Operators must satisfy themselves over the identity of any other visitors to the Control Room and the purpose of the visit. Where any doubt exists access will be

refused. Visitors will be accompanied by control room operators and details of all visits and visitors will be recorded in the Control Room log book.

5.6 If out of hours emergency maintenance arises, the Business Manager or nominated representative must be satisfied of the identity and purpose of contractors before allowing entry.

5.7 Other administrative functions will include maintaining hard disc space, filing and maintaining occurrence and system maintenance logs.

## **6. Liaison**

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

## **7. Monitoring procedures**

7.1 Camera surveillance may be maintained at all times.

7.2 A monitor is installed in the Control Room on Dewi and in a secure (password protected) monitor on Non campus to which pictures will be continuously recorded.

## **8. Retention Procedures**

8.1 Data is not stored on servers or the cameras themselves, only on the hard drive of the individual recorder.

8.2 Recordings on the hard drive will be automatically deleted as soon as the storage capacity is reached (a minimum of 30 days and maximum of approximately 90 days).

8.3 When image storage is required, in order to maintain and preserve the integrity of the image storage 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:

(i) Each backup media must be identified by a unique mark.

(ii) A backup required for evidential purposes must be sealed, witnessed, signed, dated and stored in a separate, secure, evidence media store. If a backup 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, dated and returned to the evidence backup media store.

(iii) If the backup media is archived the reference must be noted.

8.4 Backups may be viewed by the Police for the prevention and detection of crime, authorised officers of Pembrokeshire County Council for supervisory purposes, authorised demonstration and training.

8.5 A record will be maintained of the release of Media to the Police or other authorised applicants. A register will be available for this purpose.

8.6 Viewing of media 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.

8.7 Should media be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1 (ii) of this Code. Media will only be released to the Police on the clear understanding that the media remains the property of the school, and both the media 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 media or any part of the information contained thereon. On occasions when a Court requires the release of an original media this will be produced from the secure evidence store, complete in its sealed bag.

8.8 The Police may require the school to retain the backups for possible use as evidence in the future. Such backups will be properly indexed and properly and securely stored until they are needed by the Police.

8.9 Applications received from outside bodies (e.g. solicitors) to view or release backups will be referred to the Headteacher. In these circumstances Medias 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.

## **9. Breaches of the code (including breaches of security)**

9.1 Any breach of the Code of Practice by school staff will be initially investigated by the Headteacher, in order for him/her to take the appropriate disciplinary action.

9.2 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.

## **10. Assessment of the scheme and code of practice**

10.1 Performance monitoring, including random operating checks, may be carried out by the Business Manager.

## **11. Complaints**

11.1.1 Any complaints about the school's CCTV system should be addressed to the Headteacher.

11.2 Complaints will be investigated in accordance with Section 9 of this Policy.

## **12 Access by the Data Subject**

12.1 The UK GDPR and 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.

12.2 Requests for Data Subject Access should be made on an application form available from the Headteacher.

The forms will also be available to the public.

### **13. Public information**

Copies of this Code of Practice will be available to the public from the Headteacher or Business Manager.

#### **Summary of Key Points**

- This Code of Practice will be reviewed every two years.
- The CCTV system is owned and operated by the school.
- Liaison meetings may be held with the Police and other bodies.
- Recording Media will be used properly indexed, stored and destroyed after appropriate use.
- Backups may only be viewed by Authorised School Officers, Business Manager and the Police.
- Backups required as evidence will be properly recorded witnessed and packaged before copies are released to the police.
- Backups will not be made available to the media for commercial or entertainment.
- Backups will be disposed of securely.
- Breaches of the code and remedies will be reported to the Headteacher.
- Any breaches of this code will be investigated by the Headteacher. An independent investigation will be carried out for serious breaches.