



Newnham Infants & Nursery School

and

Newnham Junior School

CCTV Policy

| | |
|------------------|--------------|
| Last Review Date | October 2023 |
| Next Review date | October 2025 |

Contents

| <u>Section</u> | <u>Description</u> | <u>Page No</u> |
|-----------------------|---|-----------------------|
| 1 | Purpose | 3 |
| 2 | Scope | 3 |
| 3 | Operation of the CCTV System | 3 |
| 4 | Policy Statement | 3 |
| 5 | Principles | 3 |
| 6 | Purposes of CCTV | 3 |
| 7 | Key objectives | 4 |
| 8 | Data Protection Legislation | 4 |
| 9 | Targeted Observations | 5 |
| 10 | Responsibilities | 5 |
| 11 | Installation | 5 |
| 12 | Monitoring & Review | 5 |
| 13 | Subject Access under the DPA | 5 |
| 14 | Procedures for Processing Subject Access Requests | 6 |
| 15 | Breaches of this Policy | 6 |
| 16 | Complaints Procedure | 6 |
| 17 | Related Policies and Codes of Practice | 6 |
| Appendix 1 | CCTV Cameras currently in operation | 7 |
| Appendix 2 | Operational Procedures | 8 |
| Appendix 3 | Access to View | 10 |

CCTV POLICY

1. PURPOSE

The purpose of this policy is to ensure:

- That the use of Closed Circuit Television (CCTV) adheres to the principles of the Data Protection Act 2018, Human Rights Act 2010, Regulation Investigatory Powers Acts 2018 and other relevant legislation.
- That the CCTV system is not abused or misused.
- That CCTV is correctly and efficiently operated and maintained.

2. SCOPE

- The policy is binding on all employees of Newnham Infants and Juniors School and applies also to other persons who may be present on the premises.
- The direct management of CCTV cameras on site will be the responsibility of the Premises Supervisor.

3. OPERATION OF CCTV SYSTEM

All cameras, monitors and data collection and retention processes are maintained operationally by named individual staff site (see appendix 1) and further maintained by a maintenance contract in accordance with this policy.

4. POLICY STATEMENT

No CCTV camera should be installed, moved or replaced without prior approval by the Head Teachers, or someone delegated to approve such projects.

All adaptations to the existing system will be monitored and managed and must be formally approved (as above) prior to any installation.

5. PRINCIPLES

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

- 1 The CCTV system will be operated fairly and lawfully and only for the defined purposes set out in Section 6 and in accordance with Section 11.
- 2 The CCTV system will be operated with due regard for the privacy of all individuals at all times.
- 3 Any change to the purposes for CCTV within Newnham Infants and Juniors School is operated (Section 6 & 11) will require the prior approval of both Head Teachers and a nominated representative.

6. PURPOSES OF CCTV

The overall purpose of CCTV within Newnham Infants and Juniors School is to help reduce the fear of crime for Pupils, Staff and other visiting members of the

public whilst they are on the premises (particularly those who are entering and leaving the premises during the hours of darkness) and to protect the school premises from criminal activities. The particular purposes of the CCTV system unless specifically identified as directed monitoring (Section 9 refers) are in accordance with the following rationale:

- 1 To assist in the prevention and detection of crime against both persons and property.
- 2 To facilitate the identification, apprehension and prosecution of offenders in relation to crime.
- 3 To ensure the security of property belonging to Newnham Infants and Juniors School and to pupils, staff and visiting members of the public to the school.

7. KEY OBJECTIVES

- 1 To detect, prevent and reduce the incidence of crime on Newnham Infants and Juniors School property.
- 2 To detect incidences of vandalism and criminal damage of property belonging to the school's pupils, staff and visiting members of the public.
- 3 To enhance the feelings of security provided to pupils, staff and visiting members of the public.

8. DATA PROTECTION LEGISLATION

The CCTV system must be operated in accordance with the guidelines set out in the 'CCTV Code of Practice' and additional guidance published by the Information Commissioner, a copy of which is available from the Information Commissioner's website

www.ico.org.uk

Newnham Infants and Juniors School must adhere to the following guidelines, to conform to this Code of Practice:

- 1 The Site Managers will be responsible for overseeing that monitoring of all images is done so in accordance with this policy and that suitable operation, backup, retention, destruction and maintenance of all storage media is conducted in accordance with the written operational procedures (see Appendix 2).
- 2 Cameras will not be hidden from view and appropriate steps must be taken, e.g. by signing and displaying posters, to inform the public of the presence of the system and its ownership at all times.
- 3 To ensure privacy the cameras are fixed and focussed only upon Newnham Infants and Juniors School property, which must be demonstrable upon specific request.
- 4 Images from the cameras are appropriately recorded in accordance with existing operational procedures (see Appendix 2).
- 5 There is no sound recording undertaken from any part of the system.

9. TARGETED OBSERVATIONS

Only for specifically defined instances and in accordance with the declared purposes and objectives, may such surveillance equipment be used for targeted observation. The Regulation of Investigatory Powers Act 2000 regulates the use of covert/directed surveillance of this type and is subject to a strict code of practice. Use of CCTV in these instances or for any other reason other than that authorised in accordance with this policy is not permissible at any time or circumstance. Covert Surveillance will only be permitted with approval of the HeadTeacher concerned, who will give approval when appropriate and with guidance from the police and/or governing body.

10. RESPONSIBILITIES

It is the responsibility of both Site Managers:

- 1 To ensure compliance with this Policy for the operation of CCTV within Newnham Infants and Juniors School.
- 2 To ensure that the operating procedures are complied with at all times.
- 3 To ensure that the purposes and objectives not exceeded.
- 4 To notify all persons where CCTV is installed and that a CCTV is in operation.
- 5 To facilitate formal subject access requests of any images captured under the terms of the Data Protection Act 1998.
- 6 To provide copies of this Policy when required to do so.

11. INSTALLATION

The installation of additional cameras must be appropriate to its original identified and documented business purpose in accordance with this policy.

12. MONITORING AND REVIEW

This Policy, its operation and the operation of Newnham Infants and Juniors School's CCTV system will be reviewed annually by both Site Managers.

13. SUBJECT ACCESS

Only the HeadTeachers or nominated representative, in response to a formal request, will permit subject access to the images monitored by the system either in hard copy format or by informal viewing.

Individuals wishing to access images from the system or formal subject access requests specifically relating to CCTV must write to the HeadTeacher, Newnham Infants or Newnham Juniors School. The Site Manager of the respective school will complete the 'Access Log' (see Appendix 3) and file for a period of 3 years.

14. PROCEDURES FOR PROCESSING SUBJECT ACCESS REQUESTS

Subjects who wish to access the school's CCTV system must contact the School's HeadTeacher and must state the nature of their relationship with the school (for example employee, former employee, visitor, and contractor). Any member of staff receiving such a request must forward it immediately to the HeadTeacher.

15. BREACHES OF THIS POLICY

The Site Manager, Newnham Infants or Juniors School will investigate any breaches of this policy, where necessary.

As a major purpose of this system is assisting with the safeguarding of the health and safety of pupils, staff and visiting members of the public, it should be noted that intentional or reckless interference with any part of any monitoring equipment, including cameras/monitor/back-up media, would be treated as a disciplinary offence.

16. COMPLAINTS PROCEDURE

Grievances and complaints regarding the operation of Newnham Infants and Juniors School's CCTV system must be progressed through the respective HeadTeacher.

17. RELATED POLICIES & CODES OF PRACTICE

Other related policies:

CCTV Code of Practice: Information Commissioner.

CCTV Guidance and the Data Protection Act - Good Practice Note.

| Date | Status | Comments |
|-------------------------------|-------------|----------------------------|
| 25 th January 2018 | No changes | Reviewed by the committee |
| 24 th January 2019 | No changes | Reviewed by the committee. |
| April 2021 | No Changes. | Reviewed |
| August 2022 | No changes | Reviewed |
| October 2023 | Agreed | No changes |

CCTV CAMERAS CURRENTLY IN OPERATION

| Camera Number | Location | Remarks | Camera Number | Location | Remarks |
|---------------|--|---------|---------------|----------|---------|
| ONE | Outside nursery to monitor main entrance. | None | | | OK |
| TWO | Outside on the corner of zebra classroom Infants to monitor bottom entrance. | None | | | OK |
| THREE | Outside junior classroom No 5 to monitor entrance to building. | None | | | OK |
| FOUR | Outside staffroom to monitor courtyard. | None | | | OK |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

OPERATIONAL PROCEDURES FOR THE CONTROL AND USE OF CCTV

In accordance with the CCTV Policy all use of CCTV must be conducted in accordance with:

- The current CCTV Policy.
- The Data Protection Commissioners Code of Practice (CCTV).
- The following operational procedures.

Standards

- Cameras must always be operated so that they will only capture the images relevant to the purpose for which the system has been established and approved.
- Cameras and recording equipment should be properly maintained in accordance with manufacturer's guidance to ensure that clear images are recorded. If a camera/equipment is damaged or faulty the maintenance contractor is to be notified as a matter of importance.
- Cameras are not to be altered to view any areas outside of the boundaries of Newnham Infants and Juniors School without prior permission and involvement from the HeadTeacher.

Users

- All users of CCTV equipment should be trained in their responsibilities in accordance with Newnham Infants and Juniors School's CCTV policy and this procedure.
- All staff involved in the handling of the CCTV equipment, both directly employed and contracted, will be made aware of the sensitivity of handling CCTV images and recordings.

Training

- Guidance in the requirements of the law on Data Protection will be given to staff who are required to manage and oversee the CCTV systems.
- Staff will be fully briefed and trained in respect of all functions, both operational and administrative relating to CCTV control operation.

Maintenance

- A comprehensive maintenance log will be kept which records all adjustments/alterations/servicing/non-availability of all individual schemes.
- Any CDs on which images have been recorded will be replaced when it has become apparent that the quality of images has deteriorated.
- If the systems records for location/time/date these will be periodically checked (at least weekly) for accuracy and adjusted accordingly. In the case of alterations due to 'British Summer Time' the system should be checked for accuracy.
- A separate log must be kept and retained to record when (date and time) and who changed the back-up tape against the identified tape.
- Tapes will not be retained for any longer than 31 days from the date of recording, erased then re-used on no more that twelve consecutive occasions. Once a tape has reached its maximum use, its contents will be erased prior to disposal.

Access

- All staff should be made aware of the procedures for granting subject access requests to recorded images or the viewing capabilities of the CCTV system (as per the CCTV Policy). All such requests (in the first instance) should be notified promptly to the respective HeadTeacher, in writing.
- At the discretion of the HeadTeacher, non-security related personnel may be allowed to view CCTV footage:
 - 1 If they are investigating an untoward incident.
 - 2 In the case of tracing a missing pupil.
 - 3 To identify persons relating to an incident

Areas which would normally result in permission being refused, include:

- 1 Where the person wishing to view has no connection with the incident or has no management role relating to an incident.
 - 2 Where viewing is purely salacious.
 - 3 Where the performance of a member of staff not relating to crime, fraud or the investigation of untoward incidents is involved.
- Access to the recorded images should be restricted to the Site Manager. All accessing or viewing of recorded images should only occur within a restricted area and other employees should not be allowed to have access to that area or the images when a viewing is taking place
 - If images are to be specifically retained for evidential purposes i.e. following an incident, break-in etc; then these tapes must be retained in a secure place to which access is controlled.

Requests may be granted and will arise in a number of ways, including:

- Requests for a review of recording, in order to trace incidents that have been reported to the Police.
- Immediate action relating to live incidents e.g. immediate pursuit.
- Individual police officer seeking to review CCTV footage.

If CCTV footage is to be handed over to the Police or other official organisation, in the process of their enquiries, the name and station of that police officer together with a crime incident or reference number and signature must be acquired and retained prior to release. If copies are required of the footage, two copies must be made. One copy to be retained by Newnham Infants and Juniors School and the other given to the Police/other official organisation. The event will be noted in the log and the details and signature of the recipient obtained. In the event of CCTV footage being required for evidence, it will be retained for a period recommended by those involved with the case.

- Monitors displaying images from areas in which individuals would have an expectation of privacy must not be viewed by anyone other than an authorised employee of the user of the equipment.

ACCESS TO VIEW OR COPY CCTV FOOTAGE – POLICE AND PUBLIC

| | |
|--------------------------------|--|
| Name of person making request: | |
| Organisation: | |
| Address: | |
| Telephone Number: | |

DETAILS OF CCTV FOOTAGE TO BE VIEWED

| | |
|------------------------------|--|
| Date: | |
| Reason: (For police only) | |

| | | | |
|---------------------|--|--------------------------------|--|
| Signed: | | Dated: | |
| Request Granted: | | Request Denied (Reason): | |

TO BE COMPLETED IF CCTV FOOTAGE REMOVED FROM CIRCULATION

| | | | |
|--|--|-------|--|
| CD No. | | | |
| Issued To: | | | |
| Crime No: (For police only) | | | |
| Date Issued: | | | |
| Issued By: | | | |
| Return Date: | | | |
| I acknowledge receipt of the above CD: | | | |
| Signed: | | Date: | |