Uplands Infant & Nursery School

Leicester City Council

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CCTV Policy & Code of Practice

1. Introduction

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Uplands Infant School.

The system comprises a number of dome, bullet and PTZ cameras located on the school building. All cameras are monitored under restricted access from the school server room and are only available to nominated Senior Leaders.

This Code follows Data Protection Act guidelines. The Code of Practice will be subject to review to include consultation as appropriate with interested parties and will be updated once updated guidance is available with regards to the Data Protection Act 2018.

The CCTV system is owned by the school.

2. Objectives of the CCTV scheme

1. To increase personal safety of staff, students and visitors and reduce the fear of crime
2. To protect the school buildings and their assets
3. To support the Police in a bid to deter and detect crime
4. To assist in identifying, apprehending and prosecuting offenders
5. To protect members of the public and private property

3. Statement of intent

The CCTV Scheme is 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 grounds, its reception and back door and the car park to identify adverse activity occurring, anticipated or perceived, and for the purpose of securing the safety and well-being of the school's students and staff, 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.

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.

A data protection impact assessment has been completed for the CCTV system.

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.

4. Operation of the system

The CCTV system will be administered and managed by the school in accordance with the values and objectives expressed in the code. The day to day management will be the delegated responsibility of the Premises Officer during the day. Viewing of recorded images must take place in a restricted area with controlled access. The CCTV system will be operated 24 hours each day, every day of the year, recording all activity. All operators and others with access to images must be aware of the access procedures that are in place.

5. Control and Liaison

The Premises Officer will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional. If the Premises Officer is not present, the School Business Manager will perform this function.

6. Monitoring procedures

Camera surveillance may be maintained at all times and footage continuously recorded and held on system memory. Data will not be held for longer than is necessary and will be routinely deleted after 28 days.

7. Image storage procedures

In order to maintain and preserve the integrity of the USB sticks 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:

1. Each USB stick must be identified by a unique reference number (UIS001, UIS002 & UIS003).

2. Before use, each USB stick must be cleared of any previous recording.

3. The person responsible for recording will register the date and time of USB sticks recording, including the unique reference number.

4. All USB sticks required for evidential purposes must be sealed, witnessed, signed by the person responsible for recording, dated and stored in the safe. If a disc 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 responsible member of staff, dated and returned to the safe.

5. If the USB stick is archived the reference must be noted.

USB sticks may be viewed by the Police for the prevention and detection of crime. A record will be maintained of the release of USB sticks to the Police or other authorised applicants. A register will be available for this purpose.

Viewing of USB sticks by the Police or any external individual must be recorded in writing and entered in the register. Following an appropriate formal request from the Police, USB sticks will only be released to the Police on the clear understanding that the data remains the property of the school, and both the USB stick 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 USB stick or any part of the information contained thereon. On occasions when a Court requires the release of an original USB stick this will be produced from the safe, complete in its sealed bag. The Police may require the school to retain the stored USB sticks for possible use as evidence in the future. Such USB sticks will be properly indexed and properly and securely stored until they are needed by the Police.

Applications received from outside bodies (e.g. solicitors) to view or release USB sticks will be referred to the Head Teacher. In these circumstances USB sticks 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. This must be provided within one month of receiving the request. If the decision is taken not to release the images, then the image in question should be held and not destroyed until all legal avenues have been exhausted.

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 Head Teacher, in order for the Head Teacher to take the appropriate disciplinary action. Complaints will be dealt with in accordance with the ICO Code of Practice.

9. Assessment of the scheme and code of practice

Performance monitoring, including random operating checks, may be carried out by the Premises Officer or School Business Manager.

10. Complaints

Any complaints about the school's CCTV system should be addressed to the Head Teacher. Complaints will be investigated in accordance with the ICO Code of Practice.

11. 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.

Data Subject Access Requests should be made in writing to the Head Teacher. The request should provide as much information as possible to enable the school to find the images including date, time and location. If the Data Subject is unknown to the school then a photograph of the individual and/or a description of what they were wearing at the time they believe they were caught on the system may be requested in order to aid identification.

12. Public information

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

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 USB sticks used will be properly indexed, stored and destroyed after appropriate use.
- USB sticks may only be viewed by Authorised School Officers and the Police.
- USB sticks required as evidence will be properly recorded witnessed and packaged before copies are released to the police.
- USB sticks will not be made available to the media for commercial or entertainment.
- USB sticks will be disposed of securely by incineration.
- Any breaches of this code will be investigated by the Head Teacher. An independent investigation will be carried out for serious breaches.
- Breaches of the code and remedies will be reported to the Head Teacher.

Approved by Head Teacher: 

Date: 22/09/2020

Review Date: 22/09/2022