

Ysgol Pentrehafod

Pentrehafod School



Policy and Protocol on the Use of Closed Circuit Television (CCTV)

Polisi a Phrotocol ar Ddefnyddio

Teledu Cylchdaith Caeedig (CCTV)

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Created by:

Mr A Barrett, School Finance and Business Director

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Policy Statement

The purpose of this Policy is to regulate the use of the closed circuit television (CCTV) systems used to monitor and record areas of the School site and buildings for the following purposes.

- a) For the safety and security of staff, students and visitors.
- b) For security of school assets.
- c) For crime prevention and detection.
- d) For the apprehension and prosecution of offenders.

The CCTV systems will be managed at all times in compliance with **the GDPR and Data Protection Legislation.**

Context

Pentrehafod School has CCTV systems at its Main Site, Sports Hall and Pentrehafod Alternative Curriculum Education (PACE) building.

This Policy and Protocol on the use of imaged recorded by the CCTV systems is intended to provide guidelines to managers of the systems as to their duties and responsibilities under data protection legislation.

The CCTV systems at Pentrehafod School will be managed at all times in line with the **Code of Practice** issued by the Information Commissioner and the Surveillance Camera Code of Practice issued under the Protection of Freedoms Act (POFA Code).



Scope

Whilst the CCTV systems will record images of all persons who pass before the cameras, this Policy and Protocol is specifically aimed at School staff who administer the systems and to those staff, students and other users of the School who may request to see recorded images and give guidance on how such a request is to be dealt with.

Responsibilities

Those with responsibility and accountability for all surveillance camera systems activities are:

- Headteacher.
- Deputy Headteacher.
- School Finance and Business Director.

Protocol

Who will manage the CCTV Systems?

The CCTV systems will be managed by Mr A Barrett, School Finance and Business Director, and will be responsible for ensuring the day to day compliance with the Code of Practice.

Positioning of CCTV Cameras

- CCTV cameras will be sited in such a way that they only monitor areas to which the general body of staff, students and visitors has access.
- Cameras will generally cover:
 - Entrances and exits, both pedestrian and vehicular.
 - Parts of the roadways and car parks.
 - Some internal corridors.



- Reception areas.
- Some classrooms.

- The cameras will be sited or restricted to ensure that private domestic areas are not and cannot be covered.
- Signs will be placed in the proximity of cameras to ensure that staff, students and visitors are aware that they are entering a CCTV zone.
- These signs will contain the following information:
 - a) The purpose of the CCTV Policy.
 - b) The identity of the person responsible for the CCTV Policy.
 - c) Details of who to contact regarding the scheme CCTV Policy.

Sound Recording

The systems installed at Pentrehafod School do not have sound recording facilities.

Quality of the Images

The recorded images will be stored digitally, on a hard drive, with facilities for transfer to USB.

To ensure that the images are as clear as possible, in order that they are effective for the purpose for which they are intended, the following standards will be adopted:

- Installation by a competent installation company.
- Maintenance visits as required.
- External light levels will be assessed.
- Cameras will be protected from vandalism where necessary to ensure they remain in working order.



Service / Repair Call Out

Where a camera is found to be damaged or not functioning correctly for any reason then it is the responsibility of the School Finance and Business Director and IT Network Manager to:

- Make arrangements to ensure that the camera is returned to service.
- Ensure the camera is in operation as soon as practical.
- Monitor the quality of the maintenance work.

Processing the Recorded Images

Images, which are not required for the purposes of the scheme, will not be retained for longer than 30 days.

The Pentrehafod systems automatically erase images after **30 days**.

Access to Recorded Images

Access to recorded images is restricted to:

- The Headteacher and the Senior Leadership Team (SLT).
- School Finance and Business Director
- IT Network Manager
- Pupil Attendance and Well-Being (PAWB) Staff

All staff given access to the images are reminded of the need to keep information confidential.

The selling of any images of recorded events is prohibited.

Any images removed from the systems for evidential purposes will be retained in secure storage and removed by the IT Network Manager only.



The removal of images will be documented by the IT Network Manager, recording:

- The date of removal from the systems.
- The reason why the images were removed.
- Any crime number to which the images are relevant.
- The location of the images e.g. if handed to a police officer the name, number and station of that police officer.

Access to the **recorded images** necessary to confirm the continued operation of the systems on a day by day basis will be restricted to the School Finance and Business Director and designated staff.

Any viewing of recorded images will take place in a restricted area such as the ICT Office or, School Finance and Business Director's Office. Other employees, students or visitors will not be allowed access to these offices when a viewing is in progress.

Monitors that can be viewed by members of staff, students, visitors and members of the public e.g. in reception areas, cannot be used to view recorded images. These monitors will display 'live' images only.

Access to Recorded Images by the Individual (Data Subject)

Individuals whose information is recorded have the right to be provided with that information.

Data subjects may request access to recorded images and, for administrative purposes, will be asked to submit an email to pentrehafod@hwbmail.net, for the attention of Mr A Barrett, School Finance and Business Director, which indicates:



- a) The information required to locate the requested images (date, time and place).
- b) The name of the person making the request.
- c) Whether the individual making the request would be satisfied with merely viewing the images.

No fee will be charged and the data requested must be supplied within one month of the request.

The School Finance and Business Director and IT Network Manager will locate the requested images and determine whether disclosure of the images will entail disclosing images which can be used to identify a third party.

If the images involve disclosure of a third party then the agreement of that third party is required before the images can be viewed, **unless**, after careful consideration, the needs of the data subject outweigh those of the other individuals. The images may also be supplied with those of the third party obscured or redacted.

If the school, after review by the School Finance and Business Director decides that an individual subject access request is to be refused then the following information will be documented:

- a) The name of the individual making the request.
- b) The date of the request.
- c) The reason for refusing to supply the requested images.
- d) The name and signature of the manager making the decision.
- e) The reason for that decision.
- f) The name of the senior manager to whom an appeal against the decision can be made.

A written response to a data access request will be made within 21 days of the request.



Access and Disclosure of Images to Third Parties

Staff access to recorded images will need to be made in writing and be restricted to those who need to know and all access to images will be recorded.

Access to **recorded images** and disclosure of those images to a third party will only be allowed in limited and prescribed circumstances. These third parties include:

- a) Members of the Senior Leadership Team;
- b) Law enforcement agencies;
- c) Prosecution agencies;
- d) Legal representatives;

Review

This document will be reviewed every 3 years or sooner if there are legislative changes.

Data Protection Register

Copies of the school Data Protection Register entry are available on request. It can also be viewed online at www.dpr.gov.uk. The register number is **ZA015339** and the entry is listed under Pentrehafod School.

Related Documents

A Data Protection Code of Practice for Surveillance Cameras is available from the information Commissioners Office (ICO) at:

www.codeofpractice/surveillancecameracodeofpractice



Appeal to Information Commissioner

If an individual is unhappy about the way in which their request has been handled they may refer the matter to the Information Commissioner at www.ico.org.uk.

The Welsh Language

Mae Ysgol Pentrehafod wedi ymrwymo i hyrwyddo'r Gymraeg, yn unol â Safonau Cymraeg a Mesur yr Iaith Gymraeg (Cymru) 2011.

Pentrehafod School is committed to the promotion of the Welsh language, in accordance with the Welsh Language Standards and the Welsh Language (Wales) Measure 2011.



Appendix 1

CCTV – Use and Disclosure of Images

Legitimate public concerns exist over the use of CCTV and many of the specific guidelines are designed to satisfy the community that the use of cameras is subject to adequate supervision and scrutiny. It is of fundamental importance that public confidence is maintained by fully respecting individual privacy.

All employees that are authorised to use the CCTV images within Pentrehafod School must read this protocol and confirm that they understand and agree to abide by the Protocol.

1. CCTV recorded images may only be viewed by authorised staff.
2. All authorised staff viewing the CCTV recorded images will act with the utmost probity at all times.
3. All images viewed by authorised staff must be treated as confidential.
4. All authorised employees are to ensure that whilst viewing CCTV images, unauthorised employees, visitors or students cannot view the images.
5. All Authorised staff are responsible to ensure that CCTV images are not left on any screen without authorised staff being left in charge. The authorised employee should log out of the programme when leaving the screen.
6. Every viewing of the images will accord with the purposes and key objectives of the CCTV system and shall comply with this protocol.



7. All authorised staff viewing CCTV images should be aware of exercising prejudices, which may lead to complaints of the system being used for purposes other than those for which it is intended. The viewers may be required to justify their interest in any particular individual, group or individuals or property at any time.
8. All authorised staff viewing CCTV images are responsible for their every viewing of the images, which must be justifiable.
9. Any breach of the CCTV Protocol will be dealt with in accordance with existing discipline regulations, individuals must recognise that any such breach may amount to gross misconduct, which could lead to dismissal.
10. Any breach of the Data Protection Act 1998 will be dealt with in accordance with that legislation. All authorised employees viewing CCTV images must be aware of their liability under this Act

I understand and agree to abide by the CCTV Protocol

Name:

Job title:

Signature:

Date:



Document Management:

Document Ratification

This Policy was presented to Governors on 13th May 2021.

It will be reviewed in **May 2024** or if National and Local Policy
or Guideline is updated.

Signed.....

Mrs M Hughes

Chair of Governors

