



**Kepier**  
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# Policy Statement

## CCTV Systems and Code of Practice

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- Ratified By: F&GPC 27.11.13
- Review Date: As Required

**Dr PDB Collins**  
Chair of Governing Body

## **Policy Statement**

This document outlines the policy of the school governing body on the use of the CCTV within Kepier Academy and is in line with the Code of Practice on the use of CCTV systems.

The installation and the use of the CCTV system at Kepier is first and foremost to reduce crime, the fear of crime and anti-social behaviour in and around the academy building and site. The academy will operate the CCTV system in accordance with the Data Protection Act, 1998 and all relevant guidelines. (See Appendices).

Kepier CCTV systems will form part of the data protection registration.

CCTV Applications and uses;

Overt (visible recording equipment) and Covert (hidden recording equipment)

CCTV is used in the following circumstances:-

- To monitor academy buildings and locations to reduce the fear of crime, bullying or anti-social behaviour using overt systems.
- To secure evidence against persons who carry out criminal and anti-social acts to the detriment of the members of the academy community, academy buildings, equipment and resources using overt systems as appropriate.
- To secure evidence where the activities of employees may constitute criminal conduct using covert systems.
- To secure evidence where the activities of employees may constitute gross misconduct using overt systems.

## **Right To Privacy**

The academy Governors recognises their obligation under the Human Rights Act 1998 and in particular the individual's right to privacy is acknowledged as a vital consideration for all areas of CCTV usage.

## **Responsibilities**

The Principal will be responsible for the implementation of the enclosed Code of Practice for the use of the CCTV's system and for ensuring compliance.

Kepier will comply with the Code of practice regarding all current and future CCTV systems, to ensure efficiency and compliance with the code.

Kepier will maintain written/computerised log of the summary of all CCTV activities and access. This will be made available to the Principal and Governing Body of Kepier Academy.

## **CODE OF PRACTICE**

### **THE USE OF CCTV FOR OVERT SURVEILLANCE**

#### **General Principles**

This code of practice is to provide the strict basis for operational requirements for the use of CCTV systems. It should be read in conjunction with the Academy Policy Statement for the Use of CCTV Systems together with Data Protection Act 1998 (The 1998 Act) which directly relates to CCTV recording (see Appendix 1).

When the use of CCTV for covert surveillance is 'directed' the procedures for authorisation must be followed. These are detailed in a separate guidance note which complies with the Regulation of Investigatory Powers Act 2000 (The 2000 Act).

The purpose of the use of CCTV equipment is to assist with the management of the academy in the form of theft, damage or other actions. Prevention and detection of crime and anti-social behaviour together with reducing risk to the academy buildings, locations, staff and users as deemed necessary by the academies senior management team/Governors. All systems will be subjected to internal registration (Appendix 2).

Keper supports the individual's right to privacy and acknowledge that this is a vital consideration with regard to public CCTV systems.

Keper fully supports the use of CCTV systems but the support is conditional upon there being appropriate consultation as well as compliance with any relevant legislation and official guidelines of relevance.

Paragraphs 2 to 8 below describe the procedures that the academy will adopt for Overt Surveillance.

#### **Fairness**

Individuals must be made aware that they are about to enter an area where CCTV video recording is active. This will be achieved by prominent signage placed at the entrances of buildings or the perimeter and approaches of an open or less well defined area. (This will not apply in the case of covert recording.) All signage will be compliant with Data Protection Guidelines. Advice on wording, size and siting of signage must be obtained.

#### **System Installing and Camera Positioning**

The installation and use of all CCTV systems will be subject to agreement by the Principal and Director of Finance and reported to the Governing Body of the academy.

The siting and re-siting of recorders, cameras and monitors will be subject to agreement with the Principal and Director of Finance and reported to the Governing Body of the academy.

The installation of CCTV in public places shall be carried out in consultation with Northumbria Police and any relevant partners.

Targeted observations of persons in public places shall only be undertaken after detailed consultation with the Principal and appropriate officers of Northumbria Police.

## **Control of Operation of Cameras**

Operators and monitors of CCTV equipment must act with the utmost probity.

Only staff with responsibility for using the system shall have access to operating equipment and must have access to a clear statement of the objectives of the system contained in the CCTV Registration Form and responsibilities of those involved in its operation and management.

All use of the equipment shall accord with the purposes of that individual system and shall fully comply with this code of practice.

Cameras must not be used to look into private property.

Systems operators should be subject to supervision procedures to ensure compliance.

## **Digitally Recorded Material**

Digitally recorded material will be recorded for no more than 14 days with equipment programmed to overwrite data thereafter.

No unauthorised access is to be allowed to digital recordings. All requests for access should be made to the Principal, Vice Principal or Director of Finance who must be satisfied that access is for proper purposes.

## **Evidential Use of Recordings**

Requests to download digitally recorded materials shall be made to the Principal, Vice Principal or Director of Finance.

CDs required for evidential purposes shall be individually packaged, sealed and securely stored. All such discs must have the recording prevention device set to "safe".

Any CD that is provided for evidential purposes must be of proven integrity and accountable through the CCTV register.

## **Access to Recorded Material**

Recording equipment must be secured in a lockable enclosure.

Access to digital recordings will be restricted to those who have day-to-day responsibility for the system and those directly concerned with achieving the objects of the system.

The Police may apply for access to recordings where they believe that access to specific images is necessary for the investigation and detection of a particular offence or offences or for the prevention of crime.

All requests for Data must be in association with, and comply with the requirements of the Data Protection Act, Codes of Practice and other relevant legislation.

## **Subject Access**

An individual may request a copy of any recording that exists of them; this would normally be in the form of a recording on a digitally recorded CD. They may also request a description of the purposes of the recording.

The system owner's/manager's rights are that:

- The request is made in writing.
- Sufficient information is provided in order that she or he can satisfy her or himself of the identity of the individual.
- Sufficient information is provided to locate the relevant recording, a specific date and reasonable time window.
- He/she has up to 40 days to respond.
- He/she may continue with the established recording management routine.
- He/she may charge a fee up to the statutory maximum (currently £10 but, under review).

If the system owner/manager cannot comply with a request without disclosing identifiable images of third parties she/he is not obliged to comply with the request. If however, the third parties have given consent, or it is reasonable in all circumstances to comply without consent she/he may comply.

All requests for subject access will be made to the Principal.

### **Covert Recording**

An exemption in Section 29(1) of the Data Protection Act allows personal data processed for reasons of prevention or detection of crime or the apprehension or prosecution of offenders to be obtained without signs providing that the following criteria are met:

- The Principal has assessed that if we had to inform individuals that recording was taking place it would prejudice our objective.
- The Principal has reasonable cause to suspect specific criminal activity is taking place.
- That covert processing is only carried out for a limited and reasonable period of time and relates to the specific suspected criminal activity.
- That these decisions are reported to the Governing Body of the Academy.

### **Complaints**

All complaints about the operation of the CCTV systems will be dealt with under the academy complaints procedure

## **APPENDIX 1**

### **THE DATA PROTECTION ACT 1998**

The Data Protection Act 1998 relates to data processing of all types. The definition of data under the new Act includes information which is being processed by equipment operating automatically in response to instructions given for that purpose or is recorded with the intention that it should be processed by means of such equipment.

The definition of Processing is much wider in its scope than the previous legislation and includes obtaining, recording or holding information or data, or carrying out any operation or set of operations on the data, organisation of the data by transmission, dissemination, or otherwise making available, alignment, combination, blocking, erasure or destruction.

Data in the case of CCTV recordings is in the form of recorded images of individuals that can be identified from these images.

Having regard for these definitions, it will be recognised that the use of CCTV for surveillance purposes is encompassed by the requirements of the Data Protection Act.

The data protection principles which the academy as a data controller must comply with (unless a specific exemption applies) are set out in Schedule 1 of the Act and may be summarised as follows:-

1. Personal data shall be processed fairly and lawfully.
2. Personal data shall be obtained only for one or more specified and lawful purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and where necessary, kept up to date.
5. Personal data shall not be kept for longer than is necessary.
6. Personal data shall be processed in accordance with the rights of data subjects under the act.
7. Appropriate measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or damage to it.
8. Personal data shall not be transferred to a country outside the European Economic Area without adequate safeguards.

The Principal and Governing Body of Kepier have responsibility to ensure that the Academy fully complies with the Data Protection Act with regard to C.C.T.V. operations.

## **APPENDIX 2**

### **CCTV SYSTEM REGISTRATION FORM**

To be completed by the user.

A copy of this registration form will be kept on file in the Estates Managers office.

#### **Introduction**

Closed Circuit Television System installed at: Kepier

The System will be operated in accordance with Kepier CCTV Code of Practice.

The system is managed by: - Nicola Cooper, Principal

Other key personnel are:-

<u>Name</u>	<u>Job Description</u>
1. Karen Welsh	Vice Principal
2. Janice Taylor	Vice Principal
3. Tina Hannant	Director of Finance
4. Terry King	Estates Manager
5. Donna Walker	Assistant Principal
6. Colin Devlin	Associate Senior Leader
7. Danny Kilkenny	Assistant Principal
8. Rob Giles	Assistant Principal
9. Paul Tait	Year Manager
10. Denise Adamson	Year Manager
11. Gill Richardson	Year Manager
12. Dale Coxon	Year Manager
13. Carole Brown	Year Manager
14. Tim Bateson	ICT Manager

#### **Objectives**

- ✓ To assist in the detection of crime
- ✓ To provide evidence of crime
- ✓ To deter those having criminal intent

- ✓ To deter and detect anti-social behaviour
- ✓ To give confidence to learners, staff and visitors that they are in a secure environment
- ✓ To support in the management of school discipline and behaviour
- ✓ To provide information relating to vehicle traffic management
- ✓ To assist management secure evidence where activities of employees may constitute gross misconduct



## **CCTV Register**

A CCTV register will be maintained incorporating the following sections:-

1. Digital Recorder (make, model, hard drive space), recording rate and period (i.e. 25 frames per second and 28 days or otherwise)
2. Incident Report
3. Operator Duty Log
4. Visitor Log
5. Repairs and Maintenance
6. Copy of Data Protection Act & CCTV Codes of Practice
7. Request To View Form

A loose-leaf file is recommended which will cover the 7 sections.  
(See Appendices)

## **Recording Management**

The recording system is:-

DIGITAL FREE STANDING HARD DRIVE  
Please state make & model.....Avigilon Server

✓ SERVER BASED HARD DRIVE

VHS Video Recorder  
Please state make, mode

## **System Checks**

The functionality of the cameras and recorder including the time and date display (as appearing on screen) must be regularly checked for faults and accuracy.  
All faults must be reported immediately and rectified in accordance with the Maintenance Agreement.

## **Incident Reporting**

An Incident Report will be completed for each incident requiring investigation.

The original evidence CD will be inhibited from being recorded over and then placed in a tamper evident secure evidence bag together with the original of the incident report.

The evidence bag will be held by either the academy or handed to Northumbria Police for retention.

## **System Maintenance**

The system maintenance is contracted with: Vteczoom CCTV surveillance systems

Service is available between: 08.30 hrs and 17.00 hours Monday to Friday and a response time of 2 hours is agreed.

Servers will be serviced as per manufacturer's recommendations, at intervals not exceeding 2 (years). Service replacement units will be provided if a machine is removed from site.

Any fault, call out or routine maintenance visit will be reported in the CCTV Register.

## **Visitors**

Visitors to site having any connection with CCTV system i.e. Police, Service Engineers, Members of the Public, in connection with a Subject Access request, previously agreed with the System Manager must log on and off site in the CCTV Register.

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# Incident Report

<u>Time/Date</u>	<u>Description of Incident</u>	<u>Action Taken</u>	<u>Signed</u>



# Visitor Log

<u>Time/Date</u>	<u>Name and Address</u>	<u>Reason</u>	<u>Operator</u>	<u>Signature of Visitor</u>



# Request to view CCTV footage



Name:  
Signature:

Company:

Date/Time of incident:  
From: to:

Address  
Tel:

Location of incident

Exact Nature of incident

Details of offenders and/or vehicles involved

Operator ID

Log of found data	Time	Description	Camera

Persons contacted	Date	Name	Message left

If download is required for Northumbria Police - request and attach their DPA2 form