

# CCTV Policy

DESC values the mental health and wellbeing of every member of its community.

Our policies reflect the core values of respect and support for each other in every aspect of life. Our aim is that all in our community, through working together, to feel safe and secure in an environment, which enables and equips every individual to thrive and be respectful of each other's strengths and differences.

## **Introduction**

The Dacorum Education Support Centre uses closed circuit television (CCTV) images to reduce crime and monitor the Centre at both our Barncroft Campus and Tenzing Road site, in order to provide a safe and secure environment for learners, staff and visitors, and to prevent the loss or damage to Centre property.

The CCTV system is owned and operated by the Centre, the deployment of which is determined by the Centre's Senior Leadership Team (SLT). The system comprises a number of fixed cameras. The system does not currently have sound recording capability. The CCTV is monitored centrally from the Centre offices by the administrative staff on both sites, whilst the Site Manager is responsible for its maintenance and operation. The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and the Centre community.

The Centre's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images and any sound recordings is covered by the Data Protection Act 1998. This policy outlines the Centre's use of CCTV and how it complies with the Act.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are trained by the Centre's data controller in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

## **Objectives of the CCTV scheme**

The objectives of having a CCTV scheme are:

- To protect the Centre buildings and their assets
- To increase personal safety and reduce the fear of crime
- To support the police in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property
- To assist in managing the Centre

## **Statement of intent**

The CCTV Scheme will be 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 Centre 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 Centre, its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the Centre, 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. Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained using the Centre's forms for directed surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Discs will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Discs 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. 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 Centre CCTV.

## **Operation of the system**

The scheme will be administered and managed by the Headteacher, in accordance with the principles and objectives expressed in the code. The day-to-day management will be the responsibility of both the Senior Leadership Team (SLT) and the Site Manager during the day. The CCTV system will be operational 24 hours each day, every day of the year.

The Site Manager will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional. Other administrative functions will include maintaining recordings and hard disc space, filing and maintaining occurrence and system maintenance logs.

Access to the CCTV recorder will be strictly limited to the SLT and the Site Manager.

If out of hours emergency maintenance arises, the Site Manager must be satisfied of the identity and purpose of contractors before allowing entry. A visitor's book will be maintained and full details of visitors including time/data of entry and exit will be recorded.

Emergency procedures will be used in appropriate cases to call the Emergency Services.

## **Monitoring procedures**

Camera surveillance may be maintained at all times. A monitor and data recorder is installed within each of the reception offices to which pictures will be continuously recorded.

The Centre may in exceptional circumstances set up covert monitoring. For example:

- Where there is good cause to suspect that illegal or unauthorised actions, are taking place, or where there are grounds to suspect serious misconduct;

- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

If covert surveillance is planned, it can only be undertaken by the police or the Local Authority using the appropriate authorisation forms. In these circumstances authorisation must be obtained from a member of the Senior Leadership Team and covert monitoring must cease following completion of an investigation.

## **Storage and Retention of CCTV images**

In order to maintain and preserve the integrity of the discs 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:

- Each disc must be identified by a unique mark.
- Before using, each disc must be cleaned of any previous recording.
- The controller must register the date and time of disc insert, including disc reference.
- A disc (recording) required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence store. 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 controller, dated and returned to the evidence store.
- If the disc is archived the reference must be noted.

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

All retained data will be stored securely.

## **Restricted access to CCTV images**

Access to recorded images is managed by the Site Manager, and will be restricted to those members of the Senior Leadership Team authorised to view them. Recorded images will not be made more widely available.

## **Access to and Disclosure of Images to Third Parties**

There will be no disclosure of recorded data to third parties' other than to authorised personnel such as the Police and service providers to the Centre where these would reasonably need access to the data (e.g. investigators). Any such requests should be made in writing to the Headteacher.

Recordings may be viewed by the police for the prevention and detection of crime and authorised officers of the Local Authority / County Council. A record will be maintained of the release of recordings to the police or other authorised applicants. A register will be available for this purpose.

Viewing of recordings 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. Should a recording be required as evidence, a copy may be released to the police under the procedures described in the above bullet points of section 8 of this Code. Recordings will only be released to the police on the clear understanding that the recording remains the property of the Centre, and both the recording and information contained on it are to be treated in accordance with this code. The Centre also retains the right to refuse permission for the police to pass to any other person the recording or any part of the information contained thereon. On occasions when a court requires the release of an original recording, this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the Centre to retain the stored discs for possible use as evidence in the future. Such discs will be properly indexed and properly and securely stored until they are needed by the police.

Applications received from outside bodies (for example solicitors) to view or release recordings will be referred to the Headteacher. In these circumstances discs 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. A fee can be charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

The data may be used within the Centre's disciplinary and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

## **Complaints**

Any complaints about the Centre's CCTV system should be addressed in the first instance to the Headteacher and they will be investigated in accordance with Section 9 of the CCTV Code of Practice.

Any breach of the Code of Practice by Centre staff will be initially investigated by the Headteacher, in order for them to take the appropriate disciplinary action.

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.

## **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.

All requests should be made in writing to the Headteacher. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

The Centre will respond to requests within 40 calendar days of receiving the written request and fee. A fee of £10 will be charged per request.

The Centre reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation

## **Further Information**

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office) [www.ico.gov.uk](http://www.ico.gov.uk)
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998