

ST. MARY'S CHURCH IN WALES SCHOOL, RUABON.

**CCTV CODE OF PRACTICE FOR SCHOOLS IN THE COUNTY
BOROUGH OF WREXHAM.**

The purpose of this Code of Practice is to regulate the management, operation and use of the closed circuit television (CCTV) system at St Mary's Church in Wales Voluntary Aided School hereafter referred to as 'the school' adhering to the Data Protection Act guidelines.

The system comprises of a number of fixed/static/dome/fully functional (with pan, tilt and zoom facilities) cameras located internally/externally around the school site. All cameras are monitored by selected senior and administrative staff together with those directly involved with the security of the school site.

The CCTV system is owned by the school who will review the Codes of Practice every two years and if appropriate consult with interested parties.

Objectives of the CCTV Scheme.

1. To protect the school buildings and their assets
2. To increase personal safety and reduce the fear of crime
3. To support the Police in a bid to deter and detect crime
4. To assist in the identification and apprehension of offender(s)
5. To protect children, staff and visitors to the school
6. To assist in the management of the school

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 of both the Data Protection Act and the Commissioner's Code of Practice.

The school will treat with confidentiality, the system, all information, documents and recordings obtained and used as data, which are protected by the Act.

Cameras will only be used to monitor activities within the school, its car parks and other public areas to identify criminal or anti-social behaviour actually occurring, anticipated or perceived, and for the purpose of securing the safety and well being of the school, together with its staff, pupils and visitors.

Staff have been instructed that cameras are not to focus on private homes, gardens and other areas of private property.

Unless an immediate response to an incident is required, staff must not direct cameras at an individual, their property or a specific group of individuals without authorisation being obtained as set out in the Regulation of Investigatory Powers Act 2000 which deals with Directed Surveillance.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recorded materials will only be released to the media for use in an investigation of a specific crime and with the written authority of the Police. Recorded material will never be released to the media for entertainment purposes.

The planning and design of the CCTV system has endeavoured to ensure that the cameras will give maximum effectiveness and efficiency but it is not possible to cover or detect every single incident taking place in the areas covered by cameras.

Warning signs as required by the Code of Practice of the Information Commissioner have been placed prominently in the areas covered by the school's CCTV system.

Operation of the system

The CCTV system will be administered by the Headteacher/Deputy Headteacher, in accordance with the principles and objectives expressed in the code.

The day-to-day management will be the responsibility of the Headteacher/Deputy Headteacher during the day, out of hours and at weekends.

Operational control

The Headteacher/Deputy Headteacher will check and confirm the efficiency of the system daily to ensure that all cameras are working correctly and the system is recording images from those cameras at the required frame rate.

Access to the viewing monitors will be strictly limited to selected teaching and administrative staff together with those directly involved in the security of the school site. Unless an immediate response to an incident is required, staff must not direct cameras at an individual or a specific group of individuals.

Staff, visitors, contractors and others entering areas with CCTV monitors should be strictly regulated and staff must satisfy themselves as to the identity and purpose of the visit and record these details in a visitor's book. If any doubt exists the CCTV images must be turned off until the visitor leaves the area. Casual observations will not be permitted.

If an emergency arises out of hours, permission must be obtained from the Headteacher/Deputy Headteacher to view or process recorded material. All incidents involving the Emergency Services must be notified.

Other operational functions will include managing and maintaining incidents and system maintenance log.

Retention periods in respect of the film/images will be a minimum of 15 days unless retention is necessary for a longer period. For example where a law enforcement agency is investigating a crime. During the retention period the images will be kept securely in accordance with the obligations of the Data Protection Act 1998.

Recorded Materials Procedures

In order to maintain and preserve the integrity of the recorded material used to record events from the hard drive and the facility to use the

images in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

1. Each item of recorded material must be identified by a unique mark.
2. Before use each item on which images will be recorded must be cleared of any previous recording.
3. The person making the recording shall register the date and time of recorded material insert including recorded material reference.
4. Any recorded material required for evidential purposes must be sealed, signed and stored securely. If recorded material is not copied for the Police before it is sealed, a copy may be made at a later date providing that it is resealed, signed and returned to its secure location.
5. Recorded materials may be viewed by the Police for the prevention and detection of crime, authorised officers of North Wales Police for supervisory purposes, and authorised demonstration and training.
6. A record will be maintained of the release of recorded materials to the Police or other authorised applicants. A register will be kept for this purpose and available for inspection.
7. Viewing of recorded material by the Police requested under Section 29 of the Data Protection Act 1998 must also be recorded in a register.
8. Should recorded material be required as evidence, a copy may be released to the Police under the procedures described above. Recorded materials will only be released to the Police on the clear understanding that the recorded material and information contained on it are to be treated in accordance with this Code of Practice.
9. The school also retains the right to refuse permission for the Police to pass to any other person the recorded material or any part of the information contained thereon. On occasions when a

Court requires the release of original recorded material then this will be produced from the sealed recording which is retained at the school in its secure location.

10. The Police may require the school to retain the stored recorded material for possible use as evidence in the future. Such recorded material will be properly indexed and properly securely stored until required by the Police.
11. Applications received from outside bodies (e.g. solicitors) to view or release a copy of the recorded material will be referred to the Headteacher. In these circumstances recorded materials will normally be released where satisfactory documentary evidence is produced showing they are required in legal proceedings, a subject access request, or in response to a Court Order. A fee of £10 in respect of a subject access request can be charged and in other cases a sum not exceeding the cost of materials.

Breaches of the code or breaches of security

The Headteacher will initially investigate any breach of the Code of Practice by school staff in order that the appropriate course of disciplinary action is taken.

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.

Complaints

Any complaints about the school's CCTV system should initially be addressed to the Headteacher.

Complaints will be investigated in accordance with this Code of Practice and Headteachers can seek advice from either the Councils Security Client Officer or the Council Solicitor in the Legal and Administration Department if necessary.

Access by the Data Subject

The Data Protection Act provides Data Subjects (individuals to whom personal data relates) with a right to data held about themselves which includes those obtained by CCTV.

Request for Data Subject Access should be made on an application form available from the Councils Archivist and Records Manager based at Wrexham Museum. Tel. No. 01978 317976.

Public Information

Copies of this Code of Practice will be available from the school office on request.

Useful References

- Information Commissioners Office CCTV Codes of Practice
- Information Commissioners CCTV Small Users Checklist
- Information Commissioners Additional Guidance/Good Practice Note on CCTV and Data Protection Act

All above references available at www.ico.gov.uk

Summary of Key Points

This Code of Practice will be reviewed every two years.

The CCTV system is owned, operated and maintained by the school.

Liaison meetings may be held with the Police and other bodies when/if required.

Recording recorded materials will be used properly indexed, stored securely and destroyed after appropriate use.

Recorded materials required as evidence will be properly referenced, witnessed and packaged before copies are released to the Police.

Recorded materials will not be made available to the media for commercial or entertainment purposes.

Recorded materials will not be retained longer than is necessary.

Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the approved policies and procedures of Wrexham Council.

Any breaches of this Code of Practice will be reported to the Headteacher who will carry out an initial investigation and take appropriate action as contained in this code.