



## **CCTV Policy**

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## 1 Introduction:

Images of people filmed by CCTV cameras and stored digitally are subject to the Data Protection Act 2018 (DPA) and inclusive of the UK GDPR legislations. The purpose of the Act is to protect individuals from data about them, being used against their interests or without their knowledge or consent.

It has been prepared following the guidelines contained in the Information Commissioner's Office (ICO) CCTV guidance and the 'Amended Surveillance Code of Practice'.

Breach of the DPA is a criminal offence. The enforcing and advisory authority is the Information Commissioner's Office.

For further guidance refer to: <https://www.gov.uk/data-protection> & <https://www.gov.uk/government/publications/update-to-surveillance-camera-code/amended-surveillance-camera-code-of-practice-accessible-version>

This policy documents the arrangements at The Nene Valley Partnership schools for the processing of CCTV data.

The contents of this plan will be briefed to all personnel involved in the operation of the CCTV system.

## 2 Initial Assessment - Purposes of the use of the equipment:

CCTV will be used to monitor the building for security purposes and overall behaviour.

### Parties responsible for the equipment:

**Installation** = IT team / Site teams / Supplier of equipment for individual schools

**Operational Responsibilities** = IT team / Site team and Business Managers / Heads of School as determined by individual schools.

### Purpose(s) of the equipment:

The intended purpose of the equipment. Common uses include:

- Crime prevention and detection;
- Monitoring of vehicular and pedestrian movement around the premises;
- Prevention and detection of bullying (in schools);
- Vandalism prevention and detection.

## 3 Siting of Cameras:

IT/Site team are responsible for locations of CCTV cameras with careful regard for security and privacy.

## 4 Signs:

Signage must be placed at main Reception and various locations around the school sites advising users and visitors that CCTV is in operation.

In specific situations, cameras may be used to record sound, in this case notices will be displayed to inform of this capability.

## **5 Image Quality:**

It is important that the images produced by the equipment are clear and effective for the intended purpose.

To ensure that image quality is adequate, the following arrangements are in place:

- All images are digitally recorded and stored on the NVR's (network video recorder) hard drive. The recording device is serviced annually to ensure all images remain clear. Cameras are cleaned as necessary.
- Accuracy of time/date capturing facility.
- Times/dates are checked through regularly.

Maintenance, servicing and breakdown:

- All equipment is maintained by the schools and should include an internal annual maintenance check as well as reactive maintenance.

## **6 Surveillance:**

Images are viewed initially by the agreed personnel if an incident occurs.

As the CCTV is a digital system it can be viewed through a school computer if given the access.

## **7 Processing Images:**

**Duration of retention of images:**

- Images are kept on the recording device's hard drive for a period of a maximum of 30 days.

**Person designated to control access to recorded images:**

- The person(s) designated to control the release of recorded images to the police or individuals are the Business Manager / Head of School (for primary schools), Network Manager and the other authorised users. The designated person will appoint someone to deputise to cover absence for leave and sickness.

**Viewing:**

- When viewing footage, it must only be viewed by the authorised users. If playing back footage, the requester must be supervised by an authorised user at all times. Permission to show images and footage to other parties must be authorised by the individuals that are contained within the saved image or footage unless they are being viewed for legal reasons / possible legal proceedings.

**Saving and Storing Footage:**

If footage is exported, please upload it to the "CCTV Team", label the incident, then it must be deleted after the evidence has been found, also, it cannot be shown to other people, unless it is to the person directly involved in the footage. This footage may not be shown to people other than the designated staff who are authorised to view playback footage.

**Images used for legal proceedings:**

The procedure for the removal from the premises of images used for legal proceedings are:

- Images must only be released to the police on receipt of a written request **or** if the controlling police officer signs for receipt of the images.
- Images may only be released with the permission of the designated person.
- The *CCTV Footage Request Form (External)* (Appendix 2) must be used to record:
  - a) the date the images were removed from the storage area;
  - b) the reason why the images were removed from the storage area;
  - c) any crime incident number to which the images may be relevant;
  - d) the location of the images (e.g. if handed to the police, the name of the police station and police officer);
  - e) The signature and I.D. number of the police officer taking receipt of the images.

**Images used by the organisation/Trust:**

- Recorded images may be released to the applicant after completing the relevant CCTV request documentation *CCTV Footage Request Form (Internal)* (Appendix 3)
- Images may only be released with the people that are authorised to play back the footage, these are listed below.

**Authorised Users:**

The organisation has appointed the following individuals as being authorised to remove images from the storage area for viewing away from the monitoring system:

Business Managers  
Network Manager  
IT Team  
Premises Managers  
Heads of Schools / Headteachers  
Behaviour Manager  
Assistant Headteacher responsible for behaviour

The designated person must ensure that the authorised person completes and signs the appropriate form (Appendix 2 or 3) when issuing recorded images to the applicant. The form must be used to record:

- a) the date the images were removed from the storage area;
- b) the reason why the images were removed from the storage area;
- c) the location where the images will be stored (i.e. specific share on the server);
- d) the name and signature of the recipient;

And after examination of the images:

- a) the outcome of the use of the images;
- b) the date of return of the images from the recipient.
- c) disposal of the images.

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

Access to images is only permitted to law enforcement agencies, school management personnel or to an applicant who has submitted a Subject Access Request (Section 8).

## **8 Access by Data Subjects:**

Under the Data Protection Act 2018 individuals have the right to request data about themselves. Subject Access Requests can be submitted in any form, but we may be able to respond to requests more quickly if they are made in writing.

There will normally be no charge, however, in the scenario of extended searches and investigations, a charge may be made appropriate to the time and amount of information extracted. A response will be provided within one calendar month.

As the images are only retained for a limited period as documented in section 7, in practice requests can only be dealt with if received before the images are deleted. If the request is received before the images are deleted, ensure that the data file containing the image is retained until the search has been carried out.

The designated person must deal with all requests. The NVP Data Protection Lead (DPL) must be informed of all Subject Access Requests.

If the designated person does not know the person making the request, they will request that the individual provide photographic ID.

The designated person will carry out, or instruct another authorised user to carry out the search.

**The individual must be provided with a copy of the recorded image except where any exemptions under the Data Protection Act 2018 apply, unless:**

- They agree merely to view the image or
- To provide such a copy would involve disproportionate effort.
- If they agree to merely view the images, a private viewing attended only by parties agreed by the individual and the designated person should be arranged.

Where necessary the designated person will seek guidance from the ICO or Data Protection Lead of The Nene Valley Partnership.

If it is necessary to disguise the identity of third parties the recorded image may be edited in school with appropriate software or sent to a specialist company with a written agreement that the processing of data will be in accordance with the DPA.

The designated person may refuse to process the request where the disclosure of the information would prejudice the purposes of crime detection for which the scheme was intended.

Any individual submitting a Subject Access Request must be provided with a copy of the information in Appendix 1 *“Information For Individuals Making Requests For CCTV Recorded Images”*

## Appendix 1

### Information For Individuals Making Requests For CCTV Recorded Images:

1. The Nene Valley Partnership schools record CCTV images for the purposes of:
  - Crime prevention and detection;
  - Monitoring of vehicular and pedestrian movement around the premises;
  - Prevention and detection of bullying (in schools);
  - Vandalism prevention and detection.
2. The IT team manages the CCTV scheme in conjunction with individual schools.
3. The images are recorded digitally.
4. Images are overwritten after a maximum of 30 days. If your request is made after images have been overwritten it will be impossible to process your request.
5. It is the policy of The Nene Valley Partnership to disclose images to:
  - Law enforcement agencies for the purposes of crime detection;
  - The school management to detect behavioural incidents such as but not limited to violence, property damage and bullying.
6. Under the Data Protection Act 2018, you have a right to request access to images of yourself that have been captured by the CCTV system. To do this you need to fill in an external request form. There will normally be no charge, however, in the scenario of extended searches and investigations, a charge may be made appropriate to the time and amount of information extracted. Images of other people in the image may, for the protection of their privacy and at the discretion of the designated person, be disguised.
7. A response will be provided within one calendar month. The search process will not commence until the request form and fee (if applicable) have been received.
8. If the search does locate the images requested, the person who manages the system may not be able to provide a copy of the images if to do so would involve effort which is disproportionate to their value. In this case, you will be invited to view the images in the CCTV monitoring room, or other private viewing facility.
9. The designated person may refuse your request for access to recorded images. If this is the case, you will be provided with the reason for refusing the request to provide access to the information.
10. The DPL is the first point of contact for individuals whose data the school processes, and for the ICO.

Our DPL is contactable via [nvp-dpo@nenevalleypartnership.com](mailto:nvp-dpo@nenevalleypartnership.com) and we acquire legal advice via:

School Data Protection Officer  
Warwickshire Legal Services  
Warwickshire County Council  
Shire Hall  
Market Square  
Warwick CV34 4RL

11. For further guidance refer to CCTV guidance on the Data Protection websites:  
<https://www.gov.uk/data-protection> & <https://www.gov.uk/government/publications/update-to-surveillance-camera-code/amended-surveillance-camera-code-of-practice-accessible-version>
12. This policy links to other NVP policies:
  - Data Protection Policy
  - Privacy Notices

**Appendix 2**

**CCTV Footage Request Form (External):**

This form is for use for members of law enforcement agencies or the public to request access to recorded images from the CCTV system at one of The Nene Valley Partnership schools. Please complete the form below and email to either:

[cctv@wollaston-school.net](mailto:cctv@wollaston-school.net)

[cctv@irchester-school.net](mailto:cctv@irchester-school.net)

[cctv@bozeat-school.net](mailto:cctv@bozeat-school.net)

[cctv@cogenhoe-school.net](mailto:cctv@cogenhoe-school.net)

**Name of who is Requesting Footage:**

**Date of Request:**

**Information Required/Brief Overview of the Incident:**

**Date/time when the incident occurred (as specific as possible):**

**Signed:**

*We will review the footage and email you a response to the reviewed footage. Footage availability is dependent on each individual school's CCTV platform, some retention time may vary.*

**Date Downloaded:**

**Date Collected/Viewed:**

**Date Destroyed:**



### Appendix 3

#### CCTV Footage Request Form (Internal):

This form is for use for staff to request access to recorded images from the CCTV system at one of The Nene Valley Partnership schools. Please complete the form below and email to either:

[cctv@wollaston-school.net](mailto:cctv@wollaston-school.net)

[cctv@irchester-school.net](mailto:cctv@irchester-school.net)

[cctv@bozeat-school.net](mailto:cctv@bozeat-school.net)

[cctv@cogenhoe-school.net](mailto:cctv@cogenhoe-school.net)

**Staff Name Requesting Footage:**

**Date of Request:**

**Information Required/Brief Overview of the Incident:**

**Date/time when the incident occurred (as specific as possible):**

**Which camera was the incident recorded on (location of cameras below):**

**Signed:**

*We will review the footage and email you a response to the reviewed footage. Footage availability is dependent on each individual school's CCTV platform, some retention time may vary.*

**Date Downloaded:**

**Date Destroyed:**