



Surveillance Camera Procedures (SP-01)

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1. Definitions, References and Useful Links

Data controller:	Usually an organisation rather than a person, that determines the purpose and means of processing personal data.
Data processing:	Anything that is done with data e.g. recording, displaying, using, changing, storing, transferring, deleting etc.
'Data Protection by Design':	The integration of appropriate technical and organisational measures to protect personal data and an individual's right to privacy from the design stage throughout the whole life cycle of the data.
Data subject:	Anyone who is the subject of data we hold i.e. any person whose image or voice we record using our surveillance cameras.
Personal data:	Any data that can be used to, directly or indirectly, identify a living person i.e. their image, or voice.
Surveillance Camera/system	Traditional Closed Circuit Television (CCTV) systems, Automatic Numberplate Recognition (ABPR) systems, Artificial Intelligence controlled systems, body-worn cameras, and unmanned aerial systems (drones).
Operator:	A member of staff who has received specific training in operating surveillance systems.

In developing our Surveillance Camera Procedures, we had due regard for legislation, statutory and non-statutory guidance as follows:

- The [Information Commissioner's Office \(ICO\)](#) guidance regarding:
 - [Right of access | ICO](#) (handling a Subject Access Request or SAR),
 - [Video surveillance | ICO](#),
 - [Data Protection Impact Assessments \(DPIAs\) | ICO](#), and
- The [Regulation of Investigatory Powers Act \(RIPA, 2000\)](#)
- The [Protection of Freedoms Act \(POFA, 2012\)](#)
- The [Data Protection Act \(DPA, 2018\)](#)
- The [Human Rights Act \(HRA, 1998\)](#)
- The [Equality Act \(EA, 2010\)](#)
- The Home Office guidance: [Surveillance Camera Code of Practice](#)
- Our Data Protection Policy and associated procedures.

2. Introduction

This school has in place a surveillance camera system that operates, both inside and outside of the buildings. It is a secure system of video cameras (without voice recording) which transmits a signal to a specific place for display on limited monitoring devices and which can be recorded.

We recognise that our system collects personal data that is regulated by the UK General Data Protection Regulation (UK GDPR) alongside the Data Protection Act (DPA) 2018. These procedures detail the purpose, use and management of the system and how we will ensure that we comply with relevant legislation and safeguard the individual rights of our data subjects.

Our school is registered with the ICO as a Data Controller, our registration is updated annually, and it includes our surveillance system. ICO Registration Number: ZA087578

The individual named as responsible for the operation of the system is Paul Heap. Anyone who wants to discuss our use of surveillance and the guidelines we follow can contact them on 01900 898888 and/or heappf@cockermouthschool.org during normal working hours.

We also have a Data Protection Officer whose contact details we publish on our website <https://cockermouthschool.org/> so that anyone can easily raise any concerns they might have about our use of personal data, including our surveillance system.

In operating surveillance we will follow, and staff should refer to [Video surveillance | ICO](#) guidance. It may also be necessary to refer to our Data Protection Policy e.g. to guide the protection of transfers of surveillance data.

These Procedures will be subject to regular review. If a new or additional system is being considered, the review will involve a 'Data Protection by Design' approach using a Data Protection Impact Assessment (DPIA) including consultation with the affected school community e.g. staff, students, parents etc. where appropriate.

Our aim is to ensure we avoid recording and storing excessive amounts of personal data.

3. Description & objectives of the surveillance system

The surveillance system comprises 61 fixed and moving cameras without sound recordings located around the site both internally and externally which function 24 hours a day throughout the year for the purposes of:

- protecting the buildings, assets, and personal property on site;
- enhancing the personal safety of staff, students, and members of the public such as visitors;
- reducing the fear and potential incidence of crime including theft and vandalism;
- reducing the fear and potential incidence of anti-social and harmful behaviours like bullying or hate crimes;
- supporting the Police in order to deter and detect crime;
- assisting in identifying, apprehending, and prosecuting offenders; and
- ensuring that site rules are respected so that the school can be properly managed.

System and equipment

When we decided what system to install, we chose one that can produce clear images which are useful for our purposes e.g. a large enough viewing area, high enough resolution, and sufficient frames per second of movement to be able to identify undesirable behaviour and the perpetrators. We also made sure we have the technology to compress and share the data with the proper authorities such as the Police without negatively affecting the quality of recordings and therefore its usefulness.

If we need to further update or change our surveillance system, we will use the [Surveillance Camera Commissioner's buyer's toolkit - GOV.UK](#) to help us maintain compliance.

We regularly review our use of surveillance, and we can change the way it operates, if necessary, to better protect people's privacy. For example: we can make it so that certain cameras record only at certain times of day when we have identified that the problem we need to monitor occurs and not at times when we know it doesn't.

Camera siting

When deciding where to put cameras, we tried to put them in plain sight and in places where they can capture clear images of the spaces we need to monitor, while avoiding the capture of any images (or any clear images) of people who are not using or visiting our premises e.g. passers-by or the gardens, driveways etc. of our neighbours.

Surveillance of public areas may include:

- **Protection of buildings, assets, property, and personal property:** at building perimeters, entrances & exits, lobbies & corridors, special storage areas, cashier locations, receiving areas for goods/services.
- **Monitoring of access control systems:** on restricted access areas, especially the main entrance where the camera works in tandem with the intercom so reception staff can see who is at the door.
- **Verification of security alarms:** at intrusion alarms points, exit door controls, external alarms.
- **Video patrol of public areas:** on parking areas, main entrance/exit gates, traffic control areas.
- **Providing evidence for internal disciplinary action or external criminal investigation (carried out by the Police):** surveillance of misconduct, bullying and other undesirable behaviours; robbery, burglary, and theft surveillance.

No moving camera is sited in any area where it can capture clear images of unintended or overlooked spaces when an operator moves it. Cameras are also never sited anywhere that people have a reasonable expectation of privacy e.g. toilet cubicles and changing rooms. Common use areas (e.g. handwashing spaces) are viewed by cameras where these are open to corridors and the safety/security benefits for users are considered by the school's DSL to be proportionate.

We also considered how the location environment might affect recording quality e.g. too much or too little daylight; insufficient night-time illumination; plant growth or summer foliage obscuring the lens; vulnerability to vandalism etc.

Notification and signage

These surveillance procedures describe the purpose and location of surveillance and include the contact details for the system manager in the Introduction so that anyone who wants to discuss our use of surveillance and the guidelines we follow can contact them.

These procedures are freely available to all staff on the secure staff-only information network. A copy can be provided on request to staff, students, parents, carers, or other visitors.

Our community and the public are made aware of the presence of surveillance by appropriate signage at the entrance to a surveillance zone and this is reinforced with further signage inside some areas.

Our signs are clearly visible and readable e.g. large enough to be noticed, larger print if meant to be seen from a vehicle, more prominent and/or frequent in places where people might not expect to find surveillance, or where the system is so discreet people can't easily see that they are being monitored.

4. Management roles and responsibilities

The Headteacher

The Headteacher is responsible for day-to-day operations including an overview of all data protection matters. With regard to surveillance specifically, they are responsible for:

- ensuring the system in use is broadly fit for purpose and has a suitable maintenance scheme in place;
- ensuring the system is properly registered with the ICO, that people affected by surveillance are informed about it, and that processing of the data is fair, lawful, and not excessive;
- ensuring mechanisms exist to provide all staff and other relevant individuals, such as agency workers, with suitable information and/or training to enable them to follow these procedures;
- promoting the development of good data management practice, leading by example, and encouraging good information handling practice;
- authorising the release of surveillance data to any third parties;
- approving any temporary extension of the surveillance system to cover special events that have particular security or access & communication requirements and ensuring proper withdrawal afterwards. (This is not the same as approval for mobile equipment or covert surveillance being used for very serious or criminal investigations – please see Section 5.3: Covert Surveillance).

Any of these tasks can and may be delegated to other suitably competent managerial staff, but they remain a management responsibility of the Headteacher.

The System Manager

The surveillance system manager is responsible for the day-to-day running of the system to include:

- Periodic checks of the hardware and the siting of it e.g. plant growth, vandalism etc.;
- Ensuring software, especially security updates are successfully applied as necessary;
- Carrying out the periodic tasks required e.g. monitoring data, checking storage arrangements are still suitable, ensuring data has been properly deleted etc.;
- Keeping comprehensive and accurate records of all data, surveillance and recordings, and the processing of it, especially the storage of any data and its deletion;
- Collecting and presenting useful data to senior leaders regarding the effectiveness of the system.

This person will also be available during normal operating hours and will understand and have available to them all relevant policies, procedures, technical and security information about the surveillance system to enable them to answer queries or help solve problems.

The Data Protection Officer (DPO)

There is no specific role for our DPO in managing our surveillance systems. They have more general data protection responsibilities such as:

- conducting or advising on our Data Protection Impact Assessment if we want to extend our surveillance or significantly change something about how we operate it;
- raising awareness of data protection issues which might include the proper use of surveillance;
- monitoring our own monitoring (records) of our surveillance practice;
- reporting on data protection compliance to the governing body which could include the effectiveness of our surveillance; and
- reporting data protection breaches to the ICO.

Our DPO is therefore required to liaise with the school to adequately support them with the data protections aspects of their work.

Surveillance System Operators

All surveillance system operators are members of staff suitably authorised to carry out their role and who have received specific training in:

- arrangements for recording, retaining, and deleting surveillance data in line with data protection laws;
- handling information securely;
- responding appropriately to requests for information e.g. from staff, individuals, the police etc.; and
- recognising a Subject Access Request and how to respond.

The school has trained a few key staff to monitor CCTV for the purposes of student pastoral/behavioural care. These are the Head of Year 7 and Director of Behaviour Support. In addition, the school's IT team can view data if requested to do so by a member of the schools Senior Management Team in circumstances where the System Manager, Head of Year 7 or Director of Behaviour Support is not available.

Operational expectations of surveillance camera operators are set out in Section 5: System Operation.

5. System operation

During normal operating hours, the surveillance scheme will be administered and managed by the Headteacher in accordance with the principles and objectives expressed in these procedures, although day-to-day tasks and some key monitoring tasks will be delegated to suitable and trained individuals.

Outside normal operating hours, the Premises manager will administer the scheme where issues arise. If needed the schools Business Manager will provide advice and liaise with the schools DPO as necessary.

Live visual feeds and data recording

Surveillance will generally operate 24 hours a day on every day of the year and the following conditions will apply to all live feeds and data recordings.

All cameras are monitored from designated devices and the data is only available to selected trained and authorised staff.

Our surveillance system will not be used to monitor normal teacher/student classroom activity.

Surveillance based on individual characteristics protected under the EA 2010 and other related legislation (race, gender, pregnancy, sexual orientation, national origin, disability etc.) is strictly prohibited. The system is in place to monitor suspicious activities and not individual characteristics.

Monitoring for the purposes of security and personal safety will be conducted in a professional, ethical, and legal manner and any diversion of the use of surveillance technologies and personnel for other purposes is prohibited e.g. the monitoring of political or religious activities, or monitoring employee and/or student interactions for reasons that are not compatible with those clear security and safety objectives.

Unless an immediate response to events is required, operators will not direct surveillance cameras at an individual, their property or a specific group of individuals, without an

authorisation being obtained for Directed Surveillance to take place, as set out in the RIPA 2000 (see Section 5.3).

When a surveillance camera live zoom facility is being used, a second person will be present with the camera operator to best ensure that there is no unwarranted invasion of privacy.

Materials or knowledge secured as a result of surveillance will only be used for the purposes of ensuring security and personal safety. Data will only be published in the course of the legitimate investigation of a specific crime and this will normally be on the advice of law enforcement or another relevant public authority. Data will never be released in any medium for the purposes of entertainment.

Information obtained through the surveillance system may only be released when authorised by the Headteacher following consultation with the Chair of the Governing Body. Any requests for surveillance data from the Police will be fully recorded. If a law enforcement authority is seeking a recording for a specific investigation, the request must be made in writing.

Live audio feeds and data recording

Recording conversations between people, especially members of the public, is highly intrusive data monitoring and not something easily justified. Our surveillance system is not capable of audio recording.

Covert surveillance

The UK Home Office [‘Covert Surveillance and Property Interference Code of Practice’ \(Aug 2018\)](#) paragraph 2.3 says that, “surveillance is covert if, and only if, it is carried out in a manner calculated to ensure that any persons who are subject to the surveillance are unaware that it is or may be taking place”.

Directed surveillance at individuals in a covert manner is not something we will engage in except in exceptional circumstances where serious or serial criminal offences are being committed which carry a maximum penalty of at least 6 months imprisonment. We must act in accordance with the RIPA 2000. It is much more likely that we will cooperate fully with any covert surveillance the police or other appropriate public authority receives the proper court authorisation to carry out involving our premises or organisation e.g. if serious fraud was being perpetrated against us.

We will seek appropriate advice before becoming involved in any RIPA related actions.

Control room operations

The viewing of live surveillance feeds is restricted to:

- specific trained staff in a ‘staff only’ access area when the display includes footage of areas which are **not** in plain sight of people who can see the feed display monitor e.g. the multi camera monitor showing the leisure centre entrance, side gate, car park and lifts which displays to reception staff on a monitor above the reception counter but is hidden from public view;

Control room operations will include:

- A daily check on the efficiency of the system, in particular that equipment, including software updates and the means to raise the alarm in an emergency or other relevant incident, is working properly.
- Ensuring cameras are not directed at individuals, their property, or a specific group of individuals unless in direct response to unfolding events to better achieve system aims e.g. enhanced safety and security by identifying issues and the people involved.

- Administrative functions like maintaining secure data streams and adequate recording space, filing and maintaining incident and system maintenance logs.
- Following strict protocols when allowing normally unauthorised persons e.g. untrained staff, contractors or visitors, entry to the control room as follows:
 - Being satisfied about the control room visitor's identity and legitimate reasons for entry e.g. an untrained member of staff receiving training; a contractor carrying out servicing and maintenance work; a visitor who has been granted permission to view specific images of themselves; a parent who is being shown evidence of an incident involving their child; a police officer involved in a criminal investigation using the data; another representative with legitimate reason e.g. from the Department for Education, the Health & Safety Executive etc.
 - Refusing access to unauthorised persons when their identity or legitimate reasons are in doubt.
 - Adequately supervising control room visitors throughout their visit.
 - Keeping a record of all control room visitors in the logbook including visits by normally unauthorised staff (visitor name, date & time of entry and exit, reason for entry, name of operator who supervised them).
 - Adequately protecting people's data protection rights when visitors are in the control room e.g. turning live feed monitors away or off (after ensuring data not being monitored live is being recorded instead), curtailing the visit if circumstances demand it.

The control room will always have at least one trained operator in it, or it will be locked.

Recordings will only be made by authorised staff who will only make them available for viewing by authorised staff, authorised visitors, or an appropriate public authority, in the control room or in another suitable place in school relevant to the reason for the recording (e.g. viewing via a mobile device at the scene of an incident).

6. Surveillance data handling

Storage

Surveillance data storage facilities have been designed to ensure the integrity of the data being stored is maintained so it can be used effectively for its intended purpose i.e. storage arrangements do not significantly degrade the data making it less useful.

We adequately protect this data using a mixture of operational security measures such as restricting access to trained/authorised users and locking areas where it is stored or can be viewed, and technical security measures such as encryption, secure networks and personal logins that are never shared. We also keep records of routine access through the system's own performance monitoring logs, and records of non-routine systems access via the logbook.

Surveillance camera operators receive training in data protection relevant to their specific role and all staff can find information about their responsibilities in our Data Protection Policy. All staff and relevant others such as contractors are made aware and reminded regularly that misuse of our surveillance may result in disciplinary and/or criminal proceedings against them.

Any storage of surveillance data on any kind of removable media e.g. tapes, DVDs, USB devices etc. is strictly controlled with checks in place to ensure that it:

- can only be done by a trained operative;
- does not interrupt normal surveillance operations;
- does not degrade the data or remove important date and time stamping;
- provides the information in a suitable format which is straightforward to use;

- is recorded in the automatic or manual logbook, including the final destination where ownership of the record or a copy of the record has passed to a third party e.g. police, the person in the images etc.
- is appropriately and securely stored, including sealed against tampering if being kept as evidence in any kind of proceedings.

When recording or transferring surveillance data to removable media:

- Each device will be marked with a unique reference point to easily identify it from any other.
- Each device will be suitably wiped clean of any previous data *before* subsequent recordings are transferred to it.
- Devices or data files on a device will be appropriately marked with start and end times and dates and any other important information such as camera reference/location etc.
- Devices required for evidential purposes will be appropriately sealed against tampering in front of a suitable witness, signed off by the system manager or Headteacher on behalf of our organisation as the data controller, and stored securely but separately from other recordings in readiness for handover to the proper authorities.
- When surveillance data has been sealed, it can be unsealed provided there is good reason e.g. a copy needs to be made for handover to the police – this unsealing must be done in front of an appropriate witness who is present until the original data is resealed and an appropriate record has been made in the logbook which includes details of the witness.
- Any copies made for evidential purposes will be handed over to the proper authorities at the earliest opportunity and a copy retained until the conclusion of any legal action.

Retention

Legislation requires that personal data only be kept for as long as is necessary to achieve the outcomes that it was processed for in the first place. It does not dictate how long we can retain data such as surveillance camera recordings and we only need to have a clear and justifiable policy decision to keep it.

Our retention schedule has some flexibility in it and is determined by:

- the purpose for which the information is being collected and how long it is needed to achieve this purpose;
- the settings we have selected for routine and automatic deletion, currently 30 days on the basis of how long it has taken in the past to discover, properly investigate and deal with issues;
- our procedure for temporarily extending the retention period in a routine way, for example, over the entire summer holiday period to ensure surveillance remains effective at a potentially risky time of year for the premises;
- what appropriate public authorities such as the police require us to retain and for how long in the interests of a criminal prosecution.

When we review this retention schedule, we will look at our current practice and ask:

- Have we decided on the shortest possible retention period based on our reasons for keeping data?
- Do all relevant staff, especially the surveillance camera operators or system manager, understand our retention schedule?
- Are measures in place to ensure the permanent deletion of information through secure methods at the end of this period?
- Are the checks we carry out systematic and do they include compliance with the retention period in practice?

Retention is a key question in the annual system review.

7. Access & Disclosure

Surveillance data is secured against unauthorised access using a range of organisational and technical security measures and good record keeping as described in Sections 5 and 6 above.

Unless a live surveillance feed is displayed publicly and allows viewers to see only what they can see by looking around them, only trained operators and specially authorised people are permitted to view live surveillance camera feeds or recordings. This data can only be viewed for a reason compatible with why the system was installed in the first place, or in accordance with an individual's rights under the DPA 2018. For more information about what people's rights to data protection are and how we uphold those rights please read our Data Protection Policy.

Requests to access surveillance data from people not normally authorised to view it, including staff, must be made in writing and the decision and subsequent action recorded. Examples may include:

Example 1: to detect and prevent crime

In reporting a burglary, the Headteacher provides information to the police about images of the perpetrators captured in surveillance footage.

The Headteacher can invite police to the Control Room and authorised them to view the data. If they deem the data useful to their criminal investigation, a copy can be provided, and the appropriate authorisation and disclosure record must be completed. If the police also request that the original data not be deleted until the conclusion of any legal proceedings, their direction on protecting the chain of evidence should be followed while they are present e.g. sealing the original media it is recorded on against tampering or adequately quarantining the original data stream from automatic system deletion and securing it against tampering with an additional security layer e.g. a file password.

Example 2: to maintain public safety

A parent asks to see the evidence on which school based disciplinary action against their child.

The Headteacher can invite parents to a secure office area and authorise them to view surveillance footage of the incident which prompted the action, but it would not be appropriate to provide a copy. The footage may need to be an edited copy rather than the original to protect the privacy of individuals captured who are not already identified as being involved in the incident. The appropriate authorisation and disclosure record must be completed even where no copy of the data is provided.

Example 3: to uphold an individual's personal data rights (and potentially detect and prevent crime)

A visitor requests surveillance footage of the car park, which shows their car being damaged. They say they need it so that they, or their insurance company, can take legal action. This kind of request made by an individual is most likely to be a SAR and should be handled under those procedures outlined in our Data Protection Policy.

The Headteacher should not authorise access or disclosure unless they are reasonably sure that the request is genuine and have assessed whether there is any risk to the safety of other people involved. The appropriate authorisation and disclosure record must be completed, even where a request is refused because the law requires us to justify our decisions and explain them to requestors.

Example 4: to maintain public safety (through having well trained staff)

The assistant Headteacher with key leadership responsibility for behaviour management requests the surveillance footage of a potentially violent incident being expertly diffused by a teaching assistant to use in a whole staff meeting focussed on the development of positive behaviour management strategies.

The system manager should have received enough training to enable them to decide to agree to the request while imposing strict conditions on the use and storage of the copy made. The appropriate authorisation and disclosure record must be completed.

Example 5: to detect and prevent crime (and uphold our legal right to restitution)

Our insurance company requests surveillance footage in order to pursue a civil claim for compensation against the perpetrators of damage to school property.

The Headteacher can authorise the making and secure transfer of a copy of the footage to a representative of the insurer, taking care to ensure that the identity of any person captured in the footage who was not involved in the damage is properly protected. The appropriate authorisation and disclosure record must be completed.

The decision to authorise a person to view or receive a copy of surveillance data must be made at the appropriate level. When a normally unauthorised member of staff makes a request, the system manager is expected to use their training to make and properly record an appropriate decision on allowing the access. When the requestor is not a member of staff, the Headteacher must agree and sign off on the request either granting access or denying it and giving the reasons.

Except for any court mandated order, we have the right to reasonably refuse any request for information that we feel does not comply with the DPA 2018 and we will give our reasons.

If the data recipient is a relevant public authority e.g. the police or court, it is always the recipient's responsibility to have regard for the ICO and SCC guides to surveillance required and good practice and to comply with any other legal obligations such as DPA 2018, HRA 1998 etc. in relation to any further disclosures.

Surveillance data will never be released onto the internet.

Information may be released to the media for identification purposes which could include release to the internet, but this will only be done by a proper law enforcement agency or under their express and written direction.

Once we have disclosed information to another body or public authority, such as the police, insurance company etc. they become the Data Controller for the copy they hold. It is their responsibility to comply with the DPA 2018 and any other relevant legislation in relation to any further disclosures.

Subject access requests (SARs)

Our surveillance system and the management of it has been designed to consider that we may need to comply with a SAR e.g. how easily data can be located, retrieved, transferred etc. Surveillance camera operators have been trained to recognise and respond appropriately to a SAR.

Where a SAR is made involving surveillance footage it is now much less likely that images which include other people can be provided to individuals due to the difficulties there might be in adequately anonymising those other people. The update to legislation as a result of the UK GDPR draws a distinction between being able to identify someone directly from the data provided, but

also being able to identify someone indirectly from the data provided together with other knowledge that people who see that data might reasonably already have or come by. Pixelating the features of an individual will not necessarily obscure their identity from people who know them very well, blurring an image may not sufficiently disguise a distinctive piece of clothing worn by a known associate etc. We understand how important it is that in upholding an individual's data protection rights, we don't breach the rights of anyone else.

Details of our full procedures for handling SARs can be found in our Data Protection Policy.

Freedom of information (FOI) requests

The Freedom of Information Act (FOIA) 2000 applies to us and we have a member of staff who understands our responsibilities and is responsible for responding to FOI requests within the 20 working days allowed from receipt of the request.

Section 40 of the FOIA contains a two-part exemption relating to information about individuals. If we receive a request for surveillance system information, we will consider:

- Whether the information is the personal data of the person requesting it. If so, that information is exempt from the FOIA. Instead, this request should be treated as a data protection Subject Access Request (please see Section 6.4 above and our Data Protection Policy for more information about handling SARs).
- Whether the information is the personal data of other people. If it is, the information can only be disclosed if to do so would not then be a breach of the DPA 2018.

Personal data that is not solely about the requester or is not already intentionally and lawfully published in the public domain cannot be disclosed in response to a FOI request.

Personal data which is only about the person making the FOI request can be disclosed to them but never as a response to an FOI request. We will inform the enquirer that we cannot process their FOI request because the data they have asked for is personal and disclosure is not permitted under the FOIA, but that as the images are only of them, the information could be provided under the DPA 2018 provisions for individuals to make a SAR of any organisation which they think holds data about them.

8. Breaches

A breach of these procedures by staff, and in some cases students or others, *may* result in disciplinary action and will be thoroughly investigated by the most suitable and senior leader and/or independent investigator so that appropriate remedial and disciplinary action can be taken. Information obtained in violation of these procedures may not be used in disciplinary proceedings against an employee, or a student.

A breach of these procedures may also be a breach of our legal obligations under the UK GDPR and DPA 2018 and could be reportable to the ICO where a maximum fine of €20 million could be levied. Please refer to the relevant sections of our Data Protection Policy to find out how we handle breaches of this legislation.

9. Monitoring and review

Routine performance monitoring, including random operating checks, may be carried out by the Headteacher or School Business Manager who acts as Senior Information Risk Officer for the Learning for Life MAT which Cockermouth School is a part of.

These procedures will also be regularly reviewed, either by us internally or externally by a third party to ensure the standards established when the system was set up, are being maintained.

A surveillance system annual review will be documented and provided to the Headteacher for their approval, at least annually, of the system's effectiveness. This is so that we can ensure it is still doing what it was intended to do while adequately protecting people's rights and personal data. We will consider the recorded results of the last review and:

- Why we need to continue using the system and how we justify data retention.
- How effective technical and organisational security measures have been at protecting the data.
- Whether information about operation of the system and how individuals can make access requests remains appropriate and available.
- Whether our commitment to required and good practice remains clear and we provide suitable information about complaining to us, complaining to our DPO, or complaining to the ICO about our data protection compliance.
- Whether our monitoring of our own compliance is sufficiently regular and provides us with useful information that helps us understand how our system is being used and how we can best protect people who are affected by its use.

If a review determines that the system's effectiveness has diminished or it no longer achieves its purpose, data processing will be stopped or appropriately modified as soon as is practicable.

10. Complaints

Any complaints about our surveillance system or the management of it should be addressed to the Headteacher, although anyone can also independently contact our DPO because we publish their contact details on our website.

Complaints will be investigated in accordance with our Data Protection Policy, our Complaints Procedure, and these Surveillance Camera Procedures.

APPENDIX A**CCTV SYSTEM ANNUAL REVIEW**

The School has considered the need for CCTV monitoring and have decided it is necessary for the prevention and detection of crime and for the personal protection of our staff, students, visitors and other members of our community. It will not be used for other purposes. We conduct an annual review of our use of CCTV as follows.

School/Setting:		Date:	
Assessor:		Signed:	

Review Statement	Satisfactory		Problems Identified (if any)	Corrective Action Required (if relevant)	Completed By	Date Complete
	Yes	No				
Notification has been submitted to the Information Commissioner's Office and the next renewal date recorded.						
There is a named individual who is responsible for operation of the system.						
The problem we are trying to address has been clearly defined and installing cameras is the best solution.						
The CCTV system is addressing the needs and delivering the benefits that justified its use.						
The system equipment produces clear images which law enforcement (usually the police) can use to investigate crime and these can easily be taken from the system when required.						
Cameras have been sited so that they provide clear images.						
Cameras have been positioned to avoid capturing images of people who are not visiting the premises.						
There is sufficient suitable signage notifying people that CCTV monitoring is in operation, including our contact						

Review Statement	Satisfactory		Problems Identified (if any)	Corrective Action Required (if relevant)	Completed By	Date Complete
	Yes	No				
details where it might not be obvious that the system is managed by this school.						
Information is available to help deal with queries about operation of the system and how individuals can make access requests.						
Sufficient safeguards are in place to protect wireless transmission systems from interception.						
There are sufficient controls and safeguards in place if the system is connected to, or made available across, a computer, e.g. an intranet.						
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.						
The ability to make copies of recorded data is restricted to appropriate staff.						
Recorded data will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.						
The process for deleting data is effective and being adhered to.						
Except under the direction of an appropriate public authority (usually law enforcement), images will not be provided to third parties.						
The potential impact on individuals' privacy has been identified and taken into account in the use of the system.						
We know how to respond to individuals making requests for copies of their own images and if we are unsure we know how to seek advice from the Information Commissioner as soon as such a request is made.						
When information is disclosed, it is transmitted as securely as possible e.g. hand delivered/collected in person on a device, a fully tracked postal service etc.						

Review Statement	Satisfactory		Problems Identified <i>(if any)</i>	Corrective Action Required <i>(if relevant)</i>	Completed By	Date Complete
	Yes	No				
Staff are trained in security procedures and there are sanctions in place for any misuse of surveillance system information.						
Staff have been made aware that they could be committing a criminal offence if they misuse surveillance system information.						
Regular checks are carried out to ensure that the system is working properly and produces high quality and useful data.						
There is a system in place to ensure that any manufacturer recommended CCTV system and equipment updates, especially of security software are regularly sought, applied and checked as properly functioning.						
Please keep this checklist in a safe place until the date of the next Annual Review.						

Guiding Principles of the Surveillance Camera Code of Practice

System operators should adopt the following 12 guiding principles:

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.
11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

Source: *The Information Commissioner's Office 'In the Picture: A Data Protection Code of Practice for Surveillance Cameras and Personal Data, June 2017 (Appendix 3)*

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