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PR043 CCTV Policy

'Unique Individuals Learning Together'



Policy No: PR043
Date of Policy: September 2019

Replaces Policy No: NEW
Approved by Governors: September 2019

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POLICY

Park Road CP School CCTV Policy			
Policy Number:	PR043	Issue Number:	PR043
Review Date:	September 2021	Replaces issue no:	NEW

CHANGE RECORD FORM

Version	Date of change	Date of release	Changed by	Reason for change
PR043	17/1/19		K Hirst	New Policy introduced

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1. Overview

- 1.1 Park Road CP School has in place a CCTV surveillance system, henceforth referred to as "the system", within the ground and school building. Images are monitored and recorded centrally and will be used in strict accordance with this policy. The system is owned by Park Road CP School.
- 1.2 The Head teacher, Nicky Parkinson, has responsibility for the operation of the system and for ensuring compliance with this policy and the procedures documented. The contact details for Mrs Parkinson are as follows:

Name: Nicky Parkinson,
 Email: parkroad_primary@omegamat.co.uk
 Telephone: 01925 723 550
 Address: Wroxham Road
 Great Sankey
 WARRINGTON
 WA5 3EF

In the absence of the head teacher, this responsibility transfers to the Deputy Head teacher, Mrs Quigley. She may be contacted through the same contact details above.

General Data Protection Regulations: CCTV digital images, if they show a recognisable person, are personal data and are covered by the General Data Protection Regulations. This Policy is associated with the Omega General Data Protection Policy, the provisions of which should be adhered to at all times.

2. The system

- 2.1 The system comprises: 9 bullet vari-focal cameras, 1 dome camera, 1 digital recorder, 1 monitor and 1 hard drive and 7 Public Information Signs
- 2.2 Cameras will be located at strategic points on the complex, principally at the main entrance and on the exterior of the buildings covering play grounds. No camera will be hidden from view. A list of locations is given at Appendix 1.
- 2.3 Signs will be prominently placed at strategic points and at entrance and exit points of the complex to inform staff, visitors, and members of the public that a CCTV installation is in use.
- 2.4 Although every effort has been made to ensure maximum effectiveness of the system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

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3. Purpose of the system

3.1 The system has been installed by Park Road CP School with the primary purpose of reducing the threat of crime generally, protecting Park Road CP School premises and helping to ensure the safety of all Park Road CP School staff and visitors consistent with respect for the individuals' privacy. These purposes will be achieved by monitoring the system to:

- Deter those having criminal intent
- Assist in the prevention and detection of crime
- Facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order
- Facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against staff and assist in providing evidence to managers and/or to a member of staff against whom disciplinary or other action is, or is threatened to be taken.
- Facilitate the movement of vehicles on site.
- In the case of staff to provide management information relating to employee compliance with contracts of employment.

The system will not be used:

- To provide recorded images for the world-wide-web.
- To record sound other than in accordance with the policy on covert recording.
- For any automated decision taking

3.2 Covert recording

3.2.1 Covert cameras may be used under the following circumstances on the written authorisation or request of the Data Protection Officer (DPO) or the Head teacher and where it has been assessed re: General Data Protection Regulations by the DPO

- That informing the individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording; and
- That there is reasonable cause to suspect that unauthorised or illegal activity is taking place or is about to take place.

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- 3.2.2 Any such covert processing will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected unauthorised activity.
- 3.2.3 The decision to adopt covert recording will be fully documented and will set out how the decision to use covert recording was reached and by whom.

4. Monitoring of images

- 4.1 Images captured by the system will be recorded on-site, twenty-four hours a day throughout the whole year. Monitors are sited in a locked area and are not visible from outside the room.
- 4.2 No unauthorised access to the locked area will be permitted at any time. Access will be strictly limited to the Head, Deputy Head, Maintenance Officer, Office Manager, police officers and any other person with statutory powers of entry. A list of those members of staff authorised to access the Control Room is given at *Appendix 2*.
- 4.3 Staff, guests and visitors may be granted access to the locked area on a case-by-case basis and only then on written authorisation from the DPO. In an emergency and where it is not reasonably practicable to secure prior authorisation, access may be granted to persons with a legitimate reason to enter the locked area.
- 4.4 Before allowing access to the locked area, staff will satisfy themselves of the identity of any visitor and that the visitor has appropriate authorisation. All visitors will be required to complete and sign the CCTV Access Log, located in the locked area, which shall include details of their name, their department or organisation they represent, the person who granted authorisation and the times of entry to and exit from this area, this will also include any visitors granted emergency access.

5. Staff

- 5.1 All staff with access to the locked area will be made aware of the sensitivity of handling CCTV images and recordings. The DPO will ensure that all staff are fully briefed and trained in respect of the functions, operational and administrative, arising from the use of CCTV.
- 5.2 Training in the requirements of the General Data Protection Regulations will be given to all those with access to the locked area by the DPO.

6. Recording

- 6.1 Digital recordings are made using digital video recorders operating in real time.
- 6.2 The DPA does not prescribe any specific minimum or maximum retention periods which apply to all systems or footage. Rather, retention should reflect the organisation's purposes for recording information. The retention period should be informed by the

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purpose for which the information is collected and how long it is needed to achieve this purpose. The Data Protection Acts states that data "shall not be kept for longer than is necessary for" the purposes for which it was obtained. As a data controller, the School needs to be able to justify this retention period. For a normal CCTV security system, it would be difficult to justify retention beyond a month (28 days), except where the images identify an issue – such as a break-in or theft and those particular images/recordings are retained specifically in the context of an investigation/ prosecution of that issue. Accordingly, the images captured by the CCTV system will be retained for a maximum of 28 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue. Footage will be retained only within the hard drive system. It will be overwritten automatically as the disk space is used up. Once a hard drive has reached the end of its use it will be erased prior to disposal and the log will be updated accordingly.

- 6.3 All hard drives and recorders shall remain the property Park Road CP School until disposal and destruction. Destruction will take place in the form of deletion of the hard drive.

7. Access to images

- 7.1 All access to images will be recorded in an Access Log

- 7.2 Access to images will be restricted to those staff need to have access in accordance with the purposes of the system. A list of such staff is given at *Appendix 2*.

- 7.3 Access to images by third parties

- 7.3.1 Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following authorities:

- Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder
- Prosecution agencies
- Relevant legal representatives
- The media where the assistance of the general public is required in the identification of a victim of crime or the identification of a perpetrator of a crime
- People whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings.
- Emergency services in connection with the investigation of an accident.

- 7.4 Access to images by a subject

CCTV digital images, if they show a recognisable person, are personal data and are covered by the General Data Protection Regulations. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Regulations. They do not have the right of instant access.

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- 7.4.1 A person whose image has been recorded and retained and who wishes access to the data must apply in writing to the DPO. Subject Access Request Forms are obtainable in hard copy at the reception at Park Road CP School, Wroxham Road, Great Sankey, Warrington, WA5 3EF. An electronic copy can be obtained via our website at www.parkroad.warrington.sch.uk or via email parkroad_primary@omegamat.co.uk. A response will be provided promptly and in any event within 1 month of receiving the request.
- 7.4.2 The General Data Protection Act gives the DPO the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.
- 7.4.3 If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing within 1 months, stating the reasons.

8. Complaints

- 8.1 It is recognised that some Data Subjects may have concerns or complaints about the operation of the system. Any complaint should be addressed in the first instance to the DPO, contact details via the school office. Concerns or enquiries relating to the provisions of the General Data Protection Regulations and/or The Data Protection Act 2018 may also be addressed to the DPO. These rights do not alter the existing rights of anyone under any relevant grievance or disciplinary procedures.

9. Data breach

- 9.1 A “Personal Data Breach’ means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed”
- 9.2 In the event that a data breach occurs, a thorough assessment of the breach will be made immediately by the Incident Response Team (IRT), comprised of the DPO as well as the head teacher and chair of governors.
- 9.3 Immediate steps will be taken to ensure that the breach is contained and the effects of the breach minimised and mitigated as much as possible.
- 9.4 If the data breach is deemed by the IRT to be reportable to the Information Commissioner’s Office, the ICO will be notified within 72 hours of the discovery of the breach. The ICO can be informed via their website at: <https://ico.org.uk/for-organisations/report-a-breach/> or by telephone: **0303 123 1113**
- 9.5 In the case of a serious breach, Data Subjects whose data has been affected will be notified, in writing.

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10. Compliance monitoring

- 10.1 The contact point for staff or members of the public wishing to enquire about the system will be the DPO by pre-arranged appointment.
- 10.2 Upon request enquirers will be provided with:
- A summary of this statement of policy
 - An access request form if required or requested
 - A subject access request form if required or requested
 - A copy of the Park Road CP School complaints procedures
- 10.3 All documented procedures will be kept under review and a report periodically made to senior management.
- 10.4 The effectiveness of the system in meeting its purposes will be kept under review and reports submitted as required to senior management.

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Appendix 1 – camera locations

Camera No.	Location	Type
1	Main Entrance (External - Car Park)	Samsung SCO-2080RP with night vision
2	Key Stage 2 Entrance – gate	Samsung SCO-2080RP with night vision
3	Playground (path to chickens)	Samsung SCO-2080RP with night vision
4	Playground from corner of Year 5 access ramp	Samsung SCO-2080RP with night vision
5	Hall Entrance Doors Area	Samsung SCO-2080RP with night vision
6	Playground from corner of Year 2 towards Key Stage 1 trail	Samsung SCO-2080RP with night vision
7	Reception Play area towards Key Stage 1 Gates	Samsung SCO-2080RP with night vision
8	Car Park from Kitchen towards Key Stage 1 Gates	Samsung SCO-2080RP with night vision
9	Bin area outside Kitchen Door	Samsung SCO-2080RP with night vision
10	Main Entrance (Internal - Office)	Samsung SCD-2080RP with night vision

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Appendix 2 – Personnel with Access to the Locked Area

Name	Job Title/Role	Contact Details
Nicky Parkinson	Head Teacher	Through the school office 01925 723 550 option 4
Kathryn Quigley	Deputy Head Teacher	
Peter Finch	Maintenance Officer	
Kate Hirst	Office Manager	

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Appendix 3 – CCTV Access Log Format

Date	Name	Job Title/Role/Organisation	Access Granted by	Time In	Time Out