



Notting Hill Preparatory School

1.18 CCTV Usage Policy

(EYFS & KS1-3)

Reviewer responsible: **Bursar**
Reviewed by: **NB**

Date of last review: **05/21**
Date of next review: **09/21**

CCTV USAGE POLICY

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Notting Hill Prep School. The systems comprise static cameras covering both external and internal areas in the Old Building (OB), the Jane Cameron Building (JCB) and the Portobello Green Building (PGB). Cameras are controlled from the Reception Desks of the OB, JCB and PGB, and the system can only be accessed by nominated senior, administrative and premises staff. This Policy follows the Data Protection Act (2018), which is UK's implementation of the General Data Protection Regulation (2018) guidelines and CCTV code of practice (2020). The use of CCTV has been registered with the Information Commissioner's Office (ICO).

Objectives of the CCTV system

The objectives of NHP's use of CCTV are:

- To increase the personal safety of students, staff, parents and visitors to the school and reduce the fear of crime;
- To protect the school buildings, grounds and their assets;
- To assist in identifying, apprehending and prosecuting offenders;
- To assist in managing the school

Statement of Intent

The CCTV System has been registered with the Information Commissioner under the terms of the Data Protection Act (2018) and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice. The school will treat the system and all information documents and recordings obtained and used as data protected by the Act.

Cameras will be used to monitor activities within the school and playgrounds and the area in the vicinity of the cycle racks at OB to identify adverse activity actually occurring, anticipated or perceived, and for the purpose of securing the safety and well being of the school's students and staff, parents and visitors.

Static cameras are positioned to ensure that they do not focus on private homes, gardens and other areas of private property. At no time will a camera be directed to follow or track an individual as all the currently deployed cameras are fixed.

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

The planning and design has endeavoured to ensure that the system 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 school CCTV.

There is no intention or means of audio recording within the system.

Operation of the System

The system will be administered and managed by the Bursar, in accordance with the principles and objectives expressed in the Code. The day-to-day management will be the delegated responsibility of the School Receptionists (OB & JCB).

The CCTV system operates 24 hrs a day, 365 days a year.

An annual review of our use of CCTV is undertaken (see Appendix 1).

Equipment

The School Receptionists (OB, JCB & PGB) will check and confirm the efficiency of the system weekly and in particular that the equipment is properly recording and that cameras are functional. The School Receptionists will also maintain the hard disc space. Equipment in both OB, JCB and PGB is on an annual maintenance contract with Secom.

Monitoring procedures

Camera surveillance may be maintained at all times.

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 DVD must be identified by a unique mark;
- Before using, each DVD must be cleaned of any previous recording;
- The person responsible shall register the date and time of DVD insert, including DVD reference.
- A DVD required for evidential purposes must be sealed, witnessed, signed by the Bursar, dated and stored in a separate, secure location. If a DVD 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 Bursar, dated and returned to the secure location.
- DVDs may be viewed by the Police for the prevention and detection of crime.
- A record will be maintained of the release of discs to the Police.
- Viewing of discs by the Police must be recorded in writing and in a log book. Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.
- Should a DVD be required as evidence, a copy may be released to the Police on the clear understanding that the DVD remains the property of the school and both the DVD and information contained on it are to be treated in accordance with this code. The school also retains the right to refuse permission for the Police to pass to any other person the DVD or any part of the information contained thereon. On occasions when a Court requires the release of an original DVD this will be produced from the secure site in a sealed bag.
- The Police may require the school to retain the stored DVDs for possible use as evidence in the future. Such discs will be properly indexed and securely stored until they are needed by the Police.
- Applications received from outside bodies (e.g. solicitors) to view or release footage stored on DVDs will be referred to the Headmistress. In these circumstances DVDs will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings or in response to a Court Order. A fee may be charged in such circumstances, currently £10.

- Images will be retained for up to 30 days and will then be overwritten. If images are required beyond this period a copy will be taken and stored securely and in line with the procedures above.

Breaches of the Code (including breaches of security)

Any breach of the Code of Practice by school staff will be initially investigated by the Headteacher, in order for her 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.

Assessment of the Scheme and Code of Practice

Performance monitoring, including random operating checks, may be carried out by the Bursar.

Complaints

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

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. Requests for Data Subject Access should be made in writing to the Headteacher, specifying the date, time and location of the image required. The School will respond to requests within 40 calendar days of receiving the written request and fee (£10 at School's discretion). The School reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

Public Information

Copies of this CCTV Policy will be available from the School Office.

Appendix 1

CCTV system monitoring NHP (OB, JCB & PGB)

The CCTV system and the images produced by it are controlled by The Bursar, who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 2018). Day to day management of CCTV is delegated to NHP's Premises Manager.

The Senior Management Team have considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of pupils, staff and parents. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked (date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded	May 2021	NB	Sep 2021
There is a named individual who is responsible for the day to day operation of the system	May 2021	NB	Sep 2021
A system has been chosen which produces clear images which the law enforcement bodies can use to investigate crime and these can easily be taken from the system when required.	May 2021	NB	Sep 2021
Cameras have been sited so that they provide clear images	May 2021	NB	Sep 2021
Cameras have been positioned to avoid capturing the images of persons not visiting the premises	May 2021	NB	Sep 2021
There are visible signs showing that CCTV is in operation	May 2021	NB	Sep 2021
Images from the CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	May 2021	NB	Sep 2021
The recorded images will only be retained long enough for any incident to come to light (eg for a theft to be noticed) and the incident to be investigated	May 2021	NB	Sep 2021
Except for use by law enforcement bodies, images will not be provided to third parties	May 2021	NB	Sep 2021
NHP knows how to respond to individuals making requests for copies of their own images. If unsure advice would be sought from the Information Commissioner as soon as a request is made	May 2021	NB	Sep 2021
Regular checks are carried out to ensure that the system is working properly and produces high quality images	May 2021	NB	Sep 2021