



BPS – CCTV Policy

1.0 Ownership

1.1 Bankside Primary School has in place and is further developing a CCTV surveillance system, on its site. Images are monitored and recorded centrally and are used in strict accordance with this policy. The system is owned by Bankside Primary School, Shepherds Lane, Leeds, LS8 5AW

1.2 The Head of Estates and the Business & Finance Director are jointly responsible for the operation of the system and for ensuring compliance with this policy and the procedures documented in the Procedures Manual. They may be contacted as follows:

Head of Estates

Theophilus Lamptey

(0113) 3368386

Email: lampteyt@banksideprimary.org

Business & Finance Director:

Emma Pearson

(0113) 3368384

Email: pearsons@banksideprimary.org

1.3 The responsible persons will annually:

- Review documented procedures to ensure that the provisions of the applicable Codes of Practice are being complied with
- Compare the CCTV database application with the hard drives access record to ensure no unauthorised access has taken place
- Sample recorded images to ensure the equipment is being used for its intended use only
- Monitor the quality of the maintenance work.





2.0 Compliance

2.1 Data Protection Act 1998:

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

The Bankside Primary School Data Protection Officer, who is responsible for the Data Protection Policy is:

Theophilus Lamptey

(0113) 3368384

Email: lampteyt@banksideprimary.org

2.2 Images obtained from the system which include recognisable individuals constitute personal data and are covered by the Data Protection Act. This Policy should therefore be read in conjunction with the school's Data Protection Policy. The Governor Body of the School are the registered data controllers under the terms of the Act. The Data Protection Officer for the School is the Information Manager who is responsible for ensuring compliance with the Act. This policy has written in accordance with the advisory guidance contained within the Information Commissioner's CCTV Code of Practice and the Home Office Surveillance Camera Code of Practice.

3.0 The system

3.1 The system comprises: 16 Fixed position cameras; 5 Pan Tilt and Zoom cameras; Monitors: Multiplexers; 2 network video recorder, digital recorders; Public information signs.

3.2 Cameras are located at strategic points on the school premises, principally at the entrance, playground and exit point of site and buildings.

3.3 Signs are prominently placed at strategic points and at entrance and exit points of the estate to inform staff, pupils, visitors and members of the public that a CCTV installation is in use.

3.4 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.





4.0 Purpose of the system

4.1 The system has been installed with the primary purpose of reducing the threat of crime generally, protecting the school's premises and helping to ensure the safety of all Bankside's Pupils, staff, and visitors consistent with respect for the individuals' privacy. It may also be used to monitor contractors and staff when carrying out work duties. For these reasons the information processed may include visual images, personal appearance and behaviours. Where necessary or required this information is shared with the data subjects themselves, contractors and agents, services providers, police forces, security organisations, court or tribunal, and persons making an enquiry.

These purposes are 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 pupils or staff and assist in providing evidence to the Head teacher and Senior Leadership Team and/or to a member of staff or pupil against whom disciplinary or other action is, or is threatened to be taken.
- Facilitate the movement of vehicles in the staff car park.
- In the case of contractors to provide management information relating to contractor compliance with contracts of work

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

4.2 Covert recording

4.2.1 Covert cameras may be used under the following circumstances on the written authorisation or request of the Head teacher, Assistant Head, Business and Finance Director or the Police and where it has been assessed by the Data Protection Officer





- 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.

4.2.2 Any such covert recording 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.

4.2.3 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.

5.0 Operation

5.1 Images captured by the system will be monitored and recorded in the Plant Room (Control Room) and monitored in the Admin Office and the offsite monitoring control room, twenty-four hours a day throughout the whole year. Images displayed on monitors are not visible from outside the Control Room and access to the Control Room is strictly limited

5.2 No unauthorised access to the Plant Room (Control Room) will be permitted at any time. Access will be strictly limited to authorised members of staff, police officers and any other person with statutory powers of entry. A list of those authorised to access the Plant Room (Control Room) is given at Appendix 2. All staff working in the Control Room are made aware of the sensitivity of handling CCTV images and recordings. All authorised staff are fully briefed and trained in all aspects of the operational and administrative functions of the system.

5.3 Staff, contractors, pupils and visitors may be granted access to the Control Room on a case-by-case basis and only then on written authorisation from the Head teacher, Business & Finance director or Head of Estates. 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 Control Room.





5.4 Before allowing access to the Control Room, 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 in to ES (entry sign on system), which shall include their name, their organisation, the person who granted authorisation and the times of entry to and exit from the centre. A similar log is kept of the staff on duty in the Offsite monitoring centre Control Room and any visitors granted emergency access.

6.0 Plant Room (Control Room) Administration and Procedures

6.1 Details of the administrative procedures which apply to the Control Room will be set out in a Procedures Manual, a copy of which is available for inspection by prior arrangement, stating the reasons for the request.

6.2 Images of identifiable living individuals are subject to the provisions of the Data Protection Act 1998; the Head of Estates is responsible for ensuring day to day compliance with the Act. All recordings will be handled in strict accordance with this policy and the procedures set out in the Procedures Manual.

7.0 Staff

7.1 All staff working in the Control Room will be made aware of the sensitivity of handling CCTV images and recordings. The Head of Estates will ensure that all staff are fully briefed and trained in respect of the functions, operational and administrative, arising from the use of CCTV.

7.2 Training in the requirements of the Data Protection Act 1998 (GDPR 2018 when it becomes legal) will be given to all those authorised to work by the Data Protection Officer.





8.0 Recording

8.1 Digital recordings are made using network video recorder operating in real time mode. Viewing is possible for 32-ch synchronous playback.

8.2 Images will normally be retained for thirty-five days from the date of recording, and then automatically over written and the Log updated accordingly. 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.

8.3 All hard drives and recorders shall remain the property of Bankside Primary School until disposal and destruction.

9.0 Access to images

9.1 All access to images will be recorded in the Access Log

9.2 Access to images will be restricted to authorised staff who need to have access in accordance with Data Protection Act 1998 (GDPR 2018 when it becomes legal) and the purposes of the system. A list of authorised staff and individuals is given at Appendix 2.

9.3 Disclosure of recorded material will only be made to third parties in strict accordance with Data Protection Act 1998 (GDPR 2018 when it becomes legal) and 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
- Emergency services in connection with the investigation of an accident.





9.4. CCTV digital images, if they show a recognisable person, are personal data and are covered by the Data Protection Act (GDPR 2018 when it becomes legal). Anyone who believes that they have been filmed by C.C.T.V. is entitled to ask for a copy of the data, subject to exemptions contained in the Act. They do not have the right of instant access.

9.5. A person whose image has been recorded and retained and who wishes access to the data must apply in writing to the Data Protection Officer. Subject Access Request Forms are obtainable from the Admin Office, between the hours of 0900 and 16:30 Monday to Friday, except when the school is closed or from the Data Protection Officer. The Data Protection Officer will then arrange for a copy of the data to be made and given to the applicant. The applicant must not ask another member of staff to show them the data, or ask anyone else for a copy of the data. All communications must go through the School Data Protection Officer. A response will be provided promptly and in any event within forty days of receiving the required fee and information.

The Data Protection Act gives the Data Protection Officer 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.

9.6. 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, stating the reasons.

10.0 Request to prevent processing

10.1. An individual has the right to request a prevention of processing where this is likely to cause substantial and unwarranted damage or distress to that or another individual.

10.2. All such requests should be addressed in the first instance to the Data Protection Officer, who will provide a written response within 21 days of receiving the request setting out their decision on the request. A copy of the request and response will be retained.





11.0 Complaints and Feedback

11.1 It is recognised that Staff members of School and others may have concerns or complaints about the operation of the system. Any concerns or complaints over use of the CCTV system should be addressed to dataprotection@banksideprimary.org or by telephone to the school 0113 3368383. If the complaint's issue(s) remains unresolved or there is no satisfactory outcome; the complainant may invoke the Bankside Complaints Procedure.

12.0 Annual Review

12.1 This policy was approved by the Governing Body on 8th November 2017. It will be reviewed annually to ensure that the purpose still applies.

12.2 All documented procedures will be kept under review and a report periodically made to the School Governing Body.

12.3 The effectiveness of the system in meeting its purposes will be kept under review and reports submitted as required to the School Governing Body.

Appendix 1

Authorised access to the Plant Room CCTV (Control Room).

Other than Repair engineers and authorised contractors the following have authorised access to the Plant Room CCTV (Control Room):-

Head teacher

Phase 1 Lead & Phase 2 Lead

Assistant Head Teachers

Business and Finance director

Estates Manager & Site Superintendent





Appendix 2

Those authorised access to recordings in order to achieve the purposes of the system are as below:

Estates Manager

Head teacher

Assistant Head

Business and Finance director

Site Superintendent

Authorised IT consultant

Staff and Pupils (Parent /Guardians) in connection with disciplinary matters which directly concern them

Trade Union representatives only in connection with disciplinary matters which directly concern one of their members (subject to the person's written request and consent).

Policy Ratified on 22nd March 2018 by the Full Governing Board

