



Cotmanhay
Infant and
Nursery School

CCTV AND AUDIO RECORDING POLICY

- Complete Revision
- Partial Revision
- New
- No changes

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Annual

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6

Author of the policy:

<input type="checkbox"/> Derbyshire County Council	<input checked="" type="checkbox"/> School based	<input type="checkbox"/> Other
	Name: Karen Downing (previous SBM)	Details:

If Derbyshire County Council / DfE, which issue number: N/A

Issue 1	Issue 2	Issue 3	Issue 4	Issue 5	Issue 6	Issue 7	Issue 8	Issue 9	Issue 10

REVISION RECORD:

Review date	Revised by	Comments
25.2.21	Karen Downing	New policy
8.3.22	Karen Downing	No change
6.3.23	Katy Latchford	No change
08.05.2024	Katy Latchford	No change

We are committed to safeguarding and promoting the welfare of children and young people and expect all staff and volunteers to share this commitment.

CCTV AND AUDIO RECORDING POLICY

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Legality

There are two important points within the CCTV Code of Practice 2008 which are basic points of law that must be adhered to.

CCTV Signs

CCTV signs are erected around the building within prominent locations that clearly identifies that CCTV recording and Audio recording is in operation. Signs are located at the entrance gate, the building entrance and inside reception.

Registering the CCTV System

The CCTV system is registered with the Information Commissioners office.

The registration reference is : Z5711348

The Data Protection Act 2018 and GDPR

The Data Protection Act 2018 relates to data processing of all types. The definition of data under the Act is "Personal data" means any information relating to an identified or identifiable living individual. It requires the person to be identified by a number of means, which can include photographic, audio or video footage

The definition of Processing is much wider in its scope than the previous legislation) "Processing", in relation to information, means an operation or set of operations which is performed on information, or on sets of information, such as—

- (a) collection, recording, organisation, structuring or storage,
- (b) adaptation or alteration,
- (c) retrieval, consultation or use,
- (d) disclosure by transmission, dissemination or otherwise making available,
- (e) alignment or combination, or
- (f) restriction, erasure or destruction

Data in the case of CCTV recordings is in the form of recorded images, audio of individuals that can be identified from these images and audio recordings.

Having regard for these definitions, it will be recognised that the use of CCTV for surveillance purposes is encompassed by the requirements of the Data Protection Act.

Objectives

Operators of the system have access to a clear statement of the objectives of the system and responsibilities of those involved in its operation and management and to restrict unauthorised persons from gaining access to recorded images/audio recordings.

Confidentiality

Operators of the system are aware of the need for confidentiality and that recorded information must be kept secure and available only to those directly connected with achieving the objectives of the system.

Access to CCTV/Audio recording is restricted and should only be viewed/played back/shared at the express permission of the Headteacher/SLT following a specific incident'

Copy Recordings

Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation, or a valid Subject Access request. Copies are only issued by the system manager to those directly connected with achieving the objectives of the system. Appendix A can be utilised to assist in issuing recorded images to authorised agents such as the police.

Information Sharing (Section 115, Crime and Disorder Act 1998)

The Crime and Disorder Act creates a power to share information from the System Owner/Operator to the Police and between the Police Forces, Police Authorities, Probation Committees, Local Authorities and Health Authorities.

The Data Protection Act 2018 also enables law enforcement agencies and statutory bodies to have access to information to enable them to prevent, detect and prosecute crimes, or to safeguard vulnerable adults and children.

Retention

The archive period of recordings is no longer than is necessary to achieve the objectives of the system. The archive period is 30 days.

Erasure

Digital recorders are set up in such a way as to overwrite old footage with new footage after the retention period has been reached.

Covert Recording

We do not require the use of Covert Recording on our school premises.

Use of Recordings

The CCTV recordings may be used for:

- Prevention and detection of crimes, in the school and its environment
- Pupil behaviour management, discipline and exclusions
- Staff disciplinary and associated processes and appeals

When using CCTV recordings for any of the above purposes it shall be permissible to access and enable relevant third parties to see the footage using a suitably secure device or media, subject to notification within Appendix A below.

Traceability and Record Keeping

Any recorded data that is copied to a third party data source will be encrypted.

Recordings must be logged and traceable throughout their life within the system. If images are copied to a third party media this is documented in Appendix A.

A routine audit is undertaken at regular intervals to ensure that recorded images are actually recording and that no fault exists with the recording system. The system is maintained by a ASI maintenance company and Century Fencing. The date and time settings are checked and corrected as part of the routine maintenance visits

Original recordings are only found:

- a) Within the recognised secure storage system
- b) Operational in the recording device

Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation or a valid subject access request. Copies are only issued by the system manager to those directly connected with achieving the objectives of the system.

Secure Storage of Recordings

The recordings and recording/processing equipment are only accessible to those directly concerned with achieving the objectives of the system. Recordings and Recording/Processing equipment are located in a secured lockable enclosure accessible only to authorised persons.

CODE OF PRACTICE POLICY STATEMENT

This code of practice policy statement relates to the Closed Circuit Television System and Audio Recording installed within Cotmanhay Infant and Nursery School

The beneficial owner of the system is Cotmanhay Infant and Nursery School.

The system data protection registration number is: Z5711348

The system manager is the Headteacher of Cotmanhay Infant and Nursery School who has the overall responsibility of ensuring the management of the systems recorded images, maintenance and training of persons authorised to use the system and who has responsibility as Data Controller for the CCTV system.

Authorised personnel trained to operate the system are: Katy Latchford, Kerry Gillott, Saphron Foster

CCTV and Audio Recording of Entrance/Reception Areas is based in Cotmanhay Junior School Office with shared monitors/cameras. The overall responsibility for ensuring the management of the systems recorded images/audio recordings is shared responsibility of the Headteacher's of both Cotmanhay Infant and Nursery School and Cotmanhay Junior School.

Authorised personnel trained to operate the system are: School Business Officer (Infants), Headteacher (Infants) School Business Officer (Juniors) School Business Assistant (Juniors).

The objectives of the systems are to assist in the detection of crime, provide evidence of crime and to deter those who have criminal intent and to give confidence to staff and visitors that they are in a secure environment. To provide management information relating to Health & Safety matters.

System

The system comprises of the following primary items:

Recording media type	Digital Recorder DVR recording system		
The system records images from	Colour and Black and White cameras		
Fixed cameras			
The system records audio from			
Fixed cameras			
Signs for CCTV and Audio Recording Installed			

It is the Headteacher's responsibility to ensure that all authorised staff are aware of the function of the systems and are capable of operating the system.

General Principles

The principles detailed in the CCTV Code of Practice 2008 are observed in the operation and management of the system.

APPENDIX A



SUBJECT ACCESS REQUEST

Date of footage	
Start time of footage	
End time of footage	
Cameras of required footage	
Current time on recorder	
Time using speaking clock	
Person requesting footage	
Copy of footage has been recorded to DC/DVD/USB	
Serial number of copied media disk	

The above information and associated CCTV footage has been compiled on behalf of:

The Cotmanhay Infant and Nursery School

The footage detail above has been compiled in accordance with the CCTV code of practice 2008. It is the recipient's responsibility to store and dispose of the recorded media in accordance with the CCTV Code of Practice 2008 and the recipients take full responsibility for the safe keeping of the footage as detailed above. A copy of the codes can be obtained by visiting www.ico.gov.uk.

Cotmanhay Infant and Nursery School will maintain a log of access requests detailing who the requests have been made by.

Issuer of the above footage

Name	Signature	Date

Recipient of the above footage

Name	Signature	Date
Address		
Identification		