



Surveillance camera policy

Written By: Allanson Street Primary

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Signed.....Date..... (Head Teacher)

Signed.....Date..... (Chair)

Surveillance Camera Policy

Overview

Modern surveillance camera technology provides increasing potential for the gathering and use of images and associated information. These advances vastly increase the ability and capacity to capture, store, share and analyse images and information. The technology can be a valuable tool in the management of public safety and security, in the protection of people and property, in the prevention and investigation of crime and in bringing crimes to justice. Used appropriately, current technology can provide a proportionate and effective solution where surveillance is in pursuit of a legitimate aim and meets an identified need.

Policy Development

The starting point for Allanson Street Primary School in achieving the most appropriate balance between public protection and individual privacy, and thereby achieving overt surveillance by consent, is to adopt a single set of guiding principles from the Home Office 'Surveillance Camera Code of Practice' June 2013. Following these principles allows us to establish a clear rationale for overt surveillance camera deployment, to run the system effectively and helps us to ensure compliance with other legal duties.

System Details

9 external cameras:

Camera 1:	Covering Main entrance to school building.
Camera 2:	Covering car park and main vehicle gate.
Camera 3:	Covering Thompson Centre entrance and bike store.
Camera 4:	Covering Reception/Nursery main entry gates.
Camera 5:	Covering Junior/Infant playground gate (from dining room).
Camera 6:	Covering Gaskell Street playground entry gate.
Camera 7:	Covering Infant/Junior playground gate (from nursery).
Camera 8	Covering Nursery/Infant playground gate.
Camera 14	Covering IT entrance from Junior playground.

5 internal cameras:

School camera 9:	Covering main front door.
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School camera 10:	Covering main reception area.
School camera 11:	Covering front office area.
Thompson centre camera 12:	Covering front entrance door.
Thompson Centre camera 13:	Covering reception area.

All cameras record visual images only. No audio recording is used.

Guiding Principles

1 Use of a surveillance camera must always be for a specific purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.

The purpose of the surveillance camera system at Allanson Street Primary School and the Thompson Centre is to ensure the safety of pupils, staff, parents and other service users and for the prevention of crime.

2 The use of the surveillance camera system must take into account its effects on individuals and their privacy, with regular reviews to ensure its use remains justified.

A privacy impact assessment was undertaken during the development of the surveillance system at Allanson Street Primary School. Consultation was undertaken with governors, staff, parents and wider service users. Consideration was given to the impact the surveillance system would have on the privacy of pupils, staff, parents and other service users. Consultation confirmed that there is a justified need for the use of surveillance cameras at all external entry and exit points around the school site, within the front reception areas of the main school building and the Thompson Centre and within the school front office where cash is regularly handled. This was deemed to be appropriate and proportionate in meeting the identified purpose of the system.

The privacy impact assessment is reviewed as part of the policy review.

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.

All service users at Allanson Street Primary School are made aware that they are being monitored by a surveillance camera system while on the school site and the purpose for which that information is to be used: appropriate signs are displayed at four external points as well as within the school and Thompson Centre main reception areas. School newsletters are used to annually remind parents/carers of the use of a surveillance system.

Allanson Street Primary School has in place an effective procedure for handling concerns and complaints from individuals about the use of the surveillance camera system: all complaints will be dealt with under the school's agreed Complaints Procedure.

4 *There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.*

The Headteacher at Allanson Street Primary School is responsible for ensuring proper governance arrangements are in place for the development, operation and review of the surveillance system.

The School Business Manager is responsible for the operation of the system (system user) in line with the agreed policy.

5 *Clear rules, policies and procedures must be in place before a surveillance camera is used, and these must be communicated to all who need to comply with them.*

The communication of rules, policies and procedures is undertaken as part of the induction process for the system user. It is the responsibility of the Headteacher to ensure the reliability of the system user having access to personal data, including images and information obtained by the surveillance camera system.

6 *No more images and information should be stored than that which is strictly required for the stated purpose of the surveillance camera system, and such images and information should be deleted once their purposes have been discharged.*

The surveillance system at Allanson Street Primary School stores information for a period of 10 days. During school holidays in excess of this period (Christmas, Easter and summer) the system user re-sets the system to allow the minimum storage period necessary for the system to serve its intended purpose.

In exceptional circumstances the system operator may need to retain images for a longer period of time, such as where a law enforcement body is investigating a crime, this arrangement must be agreed with the Headteacher. Once there is no longer a clearly justifiable reason to retain recorded images and information they are deleted.

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.*

The disclosure of images and other information obtained from the surveillance system at Allanson Street Primary School is controlled and consistent with the stated purpose for which the system was established: to ensure the safety of pupils, staff, parents and other service users and for the prevention of crime.

There may be limited occasions when disclosure of images to another third party, such as a person whose property has been damaged, may be appropriate.

Any requests for images or other information must be agreed by the Headteacher and facilitated by the system user. The Headteacher has the discretion to refuse any request for information unless there is an overriding legal obligation such as a court order. The Headteacher will seek advice from the LA legal team when necessary regarding the disclosure of images or other information.

Appropriate records are maintained by the system operator of any disclosure of images or other information to a third party.

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.

The system operator receives relevant training on the use of the surveillance system equipment from the installation company. The Headteacher ensures that the system user has the appropriate operational and technical competency. Ongoing training needs are addressed as necessary.

9 Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.

Live images on the monitor in the main office remain appropriately zoomed out (16 per screen) so that individuals cannot be identified. Detailed viewing of live images is restricted to the system user, the administration assistants and the Headteacher.

Recorded images are only available to the system user and are password protected in accordance with Principle 4. Recorded images are viewed by the system user in a restricted area. Images will only be stored in accordance with Principle 6. Agreed disclosure of images will be made in accordance with Principle 7.

The system user ensures that effective security safeguards are in place to protect the integrity of images and information should they be necessary for use as evidence in legal proceedings: requests for images or other information from a law enforcement agency are dealt with in the appropriate manner using the compliance resources provided by the installation company.

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.

The Headteacher and system user review the continued use of the surveillance camera system annually to ensure it remains necessary, proportionate and effective in meeting its stated purpose. Consideration is given to whether the location of cameras remains justified in meeting the stated purpose and whether there is a case for removal or relocation. The summary of this review is made available to Governors.

11 When the use of a surveillance camera 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.

The Headteacher ensures that the system is capable through processes, procedures and training of the system user of delivering images and information that is of evidential value to the criminal justice system.

The system user ensures that the stored images and information are at a quality which is suitable for its intended purpose of crime prevention, detection and investigation. The system user ensures that the meta data (e.g. time, date and location) is recorded reliably and that recorded material is stored in a way that maintains the integrity of the image and information. A record is kept by the system user as an audit trail of how images and information are handled.

12 Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and up to date.

Allanson Street Primary School does not use any reference database as part of the surveillance system.

This policy complies with the requirements of both the general data protection regulations (GDPR) and the Information Commissioner's Office Code of Practice (2014).