



MALET LAMBERT

CCTV Code of Practice

Effective Date:	03/12/2021
Date to be Reviewed:	03/12/2023
Contact Officer:	Mr Gavin Salter, Site Manager

1. Definitions for the Purposes of this Code

Personal data – any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly.

Data controller – the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data

System Manager – the person with day to day responsibility for making decisions about how the cameras are used and the processing of images captured, including maintaining the relevant code of practice.

Overt surveillance - means any use of surveillance for which authority does not fall under the Regulation of Investigatory Powers Act (RIPA) 2000.

2. Identified Key Risk Factors

The Education Alliance as data controller have identified the following risk factors.

Fraud / Theft / Wilful Damage / Breaches of Security / Use of Violence / Instances of Crime

3. Purpose of the System

- Prevent, investigate and detect crime
- Help reduce the fear of crime
- Assist with the apprehension and prosecution of offenders
- Enhance the safety of employees and the public
- To safeguard vulnerable adults and children
- Provide evidential material for court or committee proceedings
- Reduce incidents of public disorder and anti-social behaviour
- Evidence in investigations of gross misconduct (including protecting employees from allegations)
- Protect property
- Process Subject Access Requests

4. Camera Locations and Associated Coverage Linked to Perceived Risk Factors.

Camera Name	Floor	Location	Line of Site	Fixing	Risk indicator
001	Ground	Tuck Shop towards Canteen	Covering cycle shed	Static	Theft / Damage / Violence / Breaches of Security
002	Ground	Canteen towards service hatch	Tables	Static	Theft / Damage / Violence
003	Ground	Outside 1.0.16	Landing	Static	Theft / Damage / Violence
004	Ground	Outside Admin Office	Tables	Static	Theft / Damage / Violence
005	Ground	Fisheye between atrium and canteen	Forum Tables	Pan Tilt Zoom (PTZ)	Theft / Damage / Violence
005A	Ground	Fisheye on atrium roof	Forum Tables	Static	Theft / Damage / Violence
006	Ground	Outside 1.0.11	Landing	Static	Theft / Damage / Violence
007	Ground	Reception looking at reception desk	Reception	Static	Theft / Damage / Violence Breaches of Security/Fraud
008	Ground	Reception entrance	Main Doors	Static	Theft / Damage / Violence / Breaches of Security
009	Ground	LRC Looking at LRC Reception	Library desk	Static	Theft / Damage / Violence
010	Ground	LRC Looking at LRC Computer suite	Computers	Static	Theft / Damage / Violence
011	Ground	Atrium looking at mini elevator	Forum	Static	Theft / Damage / Violence
012	Ground	Panini Bar	Tables	Static	Theft / Damage / Violence / Breaches of Security
013	Ground	First Aid Corridor	Landing	Static	Theft / Damage / Violence / Breaches of Security
014	Ground	Emergency Exit in between 1.0.49 & 1.0.48	Doors	Static	Theft / Damage / Violence / Breaches of Security
015	Ground	English Hallway outside 1.0.49A looking towards staircase	Stairs	Static	Theft / Damage / Violence
016	Ground	Old Entrance looking at Staircase	Stairs	Static	Theft / Damage / Violence
017	Ground	Outside caretakers office	Doors	Static	Theft / Damage / Violence / Breaches of Security
018	Ground	Elevator across from 1.0.37	Lift	Static	Theft / Damage / Violence

019	Ground	MLF Pupil Toilets	Toilet doors	Static	Theft / Damage / Violence
020	Ground	Emergency exit in between 1.0.33 & MFL Toilets	Doors	Static	Theft / Damage / Violence / Breaches of Security
021	Ground	MLF Corridor looking towards main stair well	Landing	Static	Theft / Damage / Violence / Breaches of Security
022	Ground	Outside 1.0.30	Landing	Static	Theft / Damage / Violence /
023	Ground	Outside 1.0.27	Landing	Static	Theft / Damage / Violence
024	Ground	Outside 1.0.24 looking at D&T Stairwell	Landing	Static	Theft / Damage / Violence / Breaches of Security
025	Ground	Outside 1.0.21 looking down D&T Corridor	Landing	Static	Theft / Damage / Violence
026	First	Looking at D&T Stairwell	Stairs	Static	Theft / Damage / Violence
027	First	Art block outside 1.1.34	Landing	Static	Theft / Damage / Violence
028	First	Looking at Art block Toilets	Toilet doors	Static	Theft / Damage / Violence
029	First	Outside 1.1.36A	Landing	Static	Theft / Damage / Violence
030	First	Outside 1.1.41 looking towards Main Stairwell	Landing	Static	Theft / Damage / Violence
031	First	Outside 1.1.41 looking towards Art Block	Landing	Static	Theft / Damage / Violence
032	First	Elevator across from 1.1.46	Lift	Static	Theft / Damage / Violence
033	First	Outside 1.1.46 looking at main stairwell	Landing	Static	Theft / Damage / Violence
034	First	English Corridor outside 1.1.51	Landing	Static	Theft / Damage / Violence
035	First	Outside 1.1.56 looking towards 1.1.61	Landing	Static	Theft / Damage / Violence
036	First	Outside 1.1.56 looking towards main stairwell	Stairs	Static	Theft / Damage / Violence
037	First	Maths Balcony looking towards Conference room	Forum	static	Theft / Damage / Violence
038	First	Maths Balcony looking towards Maths Breakout	Landing	Static	Theft / Damage / Violence
039	First	Outside Main Hall looking at Atrium Elevator	Landing	Static	Theft / Damage / Violence
040	First	Main Hall near stage	Chairs	Static	Theft / Damage / Violence
041	First	Main Hall At Back	Stage chairs	Static	Theft / Damage / Violence
042	First	Music Corridor outside 1.1.21	Landing	Static	Theft / Damage / Violence
043	First	Outside 1.1.17 looking towards Maths Block	Landing	Static	Theft / Damage / Violence

044	First	Outside 1.1.17 looking towards Atrium balcony	Landing	Static	Theft / Damage / Violence
045	First	Outside 1.1.12	Landing	Static	Theft / Damage / Violence
046	Dearing Ground	Left side Stairwell	Fire escape	Static	Theft / Damage / Violence / Breaches of Security
047	Dearing Ground	Looking towards Dearing Toilets	Doors	Static	Theft / Damage / Violence / Breaches of Security
048	Dearing Ground	Main Stairwell above staff cupboard	Landing	Static	Theft / Damage / Violence
049	Dearing Ground	Outside 2.0.05 looking down corridor	Landing	Static	Theft / Damage / Violence
050	Dearing Ground	Right side Stairwell	Fire escape	Static	Theft / Damage / Violence / Breaches of Security
051	Dearing First	Outside 2.1.10 looking down Corridor	Landing	Static	Theft / Damage / Violence
052	Dearing First	Outside 2.1.05 looking at Science Breakout Area	Landing	Static	Theft / Damage / Violence
053	Dearing First	Main Stairwell above corridor entrance	Landing	Static	Theft / Damage / Violence
054	Dearing External	Above Main Entrance	Play ground	Static	Theft / Damage / Violence / Breaches of Security
055	Dearing External	Right side of the building near roof	Play ground	Static	Theft / Damage / Violence / Breaches of Security
056	PE Internal	Looking at Staff Entrance	Car park	Static	Theft / Damage / Violence / Breaches of Security
057	PE External	Looking at Pupil Entrance	Rear	Static	Theft / Damage / Violence / Breaches of Security
058	PE External	Looking towards Dearing Building	Boiler house path	Static	Theft / Damage / Violence / Breaches of Security
059	PE External	Looking at Staff Entrance	Car park	Static	Theft / Damage / Violence / Breaches of Security
060	PE External	Looking at Energy Centre	Car park	Static	Theft / Damage / Violence / Breaches of Security
061	Main External	Bottom right courtyard looking towards MFL Block	Play ground	Static	Theft / Damage / Violence /

					Breaches of Security
062	Main External	Bottom right Courtyard looking towards external café	Play ground	Static	Theft / Damage / Violence / Breaches of Security
063	Main External	Above Panini Bar looking Central Courtyard	Play ground	Static	Theft / Damage / Violence / Breaches of Security
064	Main External	Top Right Courtyard above external café	Play ground	Static	Theft / Damage / Violence / Breaches of Security
065	Main External	Courtyard Entrance Outside D&T Exit looking Inwards	Play ground	Static	Theft / Damage / Violence / Breaches of Security
066	Main External	Courtyard entrance outside 1.0.25 looking Inwards	Play ground	Static	Theft / Damage / Violence / Breaches of Security
067	Main External	Courtyard Entrance looking towards Dearing	Play ground	Static	Theft / Damage / Violence / Breaches of Security
068	Main External	Outside Training room looking towards rubbish bins	Delivery road	Static	Theft / Damage / Violence / Breaches of Security
069	Main External	Outside corner of room 1.0.07A looking towards main entrance	Car park	Static	Theft / Damage / Violence / Breaches of Security
070	Main External	Outside 1.0.49 looking towards visitor car park	Car park	Static	Theft / Damage / Violence / Breaches of Security
071	Main External	Outside 1.0.49 looking at main car gate	School entrance	Static	Theft / Damage / Violence / Breaches of Security
072	Main External	Outside 1.0.33 looking at bike shed	Bike sheds	Static	Theft / Damage / Violence / Breaches of Security
073	Car Park	Camera Pole outside PE Staff Entrance looking at Staff Car Park	Car park	PTZ	Theft / Damage / Violence / Breaches of Security
074	PE External	Looking at 3G pitches	3G Pitch	PTZ	Theft / Damage / Violence / Breaches of Security
075	PE External	Camera Pole down Pupil path to PE Pupil Entrance	Playground path	Static	Theft / Damage / Violence /

					Breaches of Security
076	Car Park	Near Energy Centre	Car park	Static	Theft / Damage / Violence / Breaches of Security/Crime
077	Car Park	Near Energy Centre	Car park	Static	Theft / Damage / Violence / Breaches of Security/Crime
078	Car Park	Near Energy Centre	Car park	Static	Theft / Damage / Violence / Breaches of Security/Crime
079	Main External	outside 1.0.49 looking towards Old entrance gate	Front of school	Static	Theft / Damage / Violence / Breaches of Security
080	Main External	Outside 1.0.33 looking towards old entrance gate	Front of school	Static	Theft / Damage / Violence / Breaches of Security

5. Control of Access to System and Images

The viewing of live time imagery captured on overt cameras that duplicate what is in general public view is acceptable. However, caution and discretion is advised at all times. Where possible, display screens should be placed in locations away from public view.

Cameras are monitored through a terminal which is located in room 1.0.43 and the recording equipment is also located in room 1.0.43.

Screens should be switched off at all times unless the camera is to be used for the purpose for which it was designed; this will avoid 'unintentional' viewing of unrelated imagery.

The Site Manager shall be the system manager and will hold the administrator's password and the right to allocate passwords to users of the system.

The named persons with associated levels of access rights to surveillance system are:

Ref	Staff Name, Job Role	Access Level
1	Gavin Salter, Site Manager	Full Access
2	Alex Dick, Finance Business Manager	Full Access
3	Dave Bassett, Assistant Site Manager	Full Access
4	Paul Browne, Caretaker	Full Access
5	Dan Walker, Caretaker	Full Access
6	Patrick Sprakes, Headteacher	View Only
7	Steven Fenna, Deputy Headteacher	View Only
8	Stephen Logan, Deputy Headteacher	View Only
9	Keri Pearson, Assistant Headteacher	View Only
10	Pamela Tarbet, Assistant Headteacher	View Only
11	Stuart Beadle, Head of House	View Only
12	Jonny Robinson, Had of House	View Only
13	Dan Midgely, Head of House	View Only
14	Dawn Harrison, Head of House	View Only

15	Cara Mathews, Head of House	View Only
16	Leanne Race-Wordsworth, Head of House	View Only
17	Kerry Palmer, Deputy Head of House	View Only
18	Arron Whelpton, Deputy Head of House	View Only
19	Katie Moore, Deputy Head of House	View Only
20	Dee Mills, Deputy Head of House	View Only
21	Josh Clackstone, Deputy Head of House	View Only
22	Terri Cheesbrough, Deputy Head of House	View Only

All authorised users of the system must be trained in the use of the system and must have read the Code of Practice and procedures in relation to its use. Once training is complete, each authorised user will sign a training register to verify that they understand how to use the system. The training register is kept in room 1.0.43.

6. Camera System Checks and Maintenance

An 8am assessment of the system will be carried out by the morning caretaker to ensure that all cameras are receiving an image (basic functionality) and that the time and date shown on the images are correct. All instances of camera malfunction must be reported as soon as possible, to Clearview Fire & Security for repair.

Image capture quality must also be tested on a daily basis. All of the functioning cameras are to be selected (on a rotational basis) and the images produced tested for clarity (in case of the need for production of images for use, in cases of criminal prosecution).

Records of the tests are to be recorded on the Sypro job log system (Trust Management System for logging maintenance / Jobs).

7. Retention of Recorded Images

Images recorded onto the hard drive of the CCTV systems shall be retained for a period of less than 28 days (unless images are being used for an ongoing investigation).

At the end of the 28 day period, images are overwritten automatically (by earliest date of recording first) or can be saved by an authorised named person if an investigation is ongoing.

This action must be recorded in the system log book, detailing date period, by whom and why the images are being retained.

Any images that may have been saved must be deleted after a period of six calendar months of retention, unless a specific request has been received stating otherwise.

8. Reference Tables in Use

Not in use

9. Disclosure of Images

Any request by an outside organisation or individual (SAR), for access to recorded or real time CCTV images must be passed to the schools Data Protection Officer for logging and authorisation.

Should the request be a 'simple', unobtrusive request, this may be dealt with on site by the Site Manager or the Finance Business Manager.

Imagery must be reviewed by the authorised named person, taking into account any possible third-party inclusion in images. Every effort should be made to protect third party privacy.

Should the authorised named person feel that any third party would not have their basic right to privacy infringed, they may offer the individual/organisation requesting sight of the imagery, the opportunity to 'view' the recorded data.

Should the individual then go on to request a copy of the imagery, this must be referred to the school's Data Protection Officer for authorisation. The appropriate request form must be completed and a record made within the system log book.

Should the school receive a request for CCTV footage from the Police the following Police requests do not require prior authorisation. However, the member of staff dealing with the request must be confident that there is a need to share the information and a log must be kept:

- Police requests relating to an immediate danger to the public/staff.
- Requests which relate to crimes the school has reported to the Police.

Once completed, details must be logged as with any other request.

If the request cannot be dealt with immediately, copied images must be held securely in the CCTV folder on the H drive as outlined in section 6.

10. Signage

Appropriate signage is displayed on all the entrances (school boundary) into the school site as shown below. Which are included in the following areas:

1. 3 x Signs on each entrance at the front of school
2. 1 x Sign on the 3G pitch
3. 1 x Sign on the Entrance to the School Field
4. 1 x Sign on the Delivery Road Entrance



11. References

Human Rights Act 1998
Data Protection Act 2018
General Data Protection Regulation
Regulation of Investigatory Powers Act 2000
Freedom of Information Act 2000
Protection of Freedoms Act 2012
The Education Alliance Surveillance Camera Policy