

The BRIT School

CCTV Code of Practice

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1. Introduction

The aim of this code of practice is to ensure that the closed circuit television (CCTV) system of The BRIT School stands up to scrutiny and is accountable to the people it aims to protect.

The BRIT School is committed to the belief that everyone has the right to respect for his or her privacy.

The code of practice for The BRIT School closed circuit television (CCTV) system, operated by the IT Security Team, is underpinned by the Information Commissioner's CCTV Code of Practice (<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>).

2. Definitions

For the purpose of the code of practice, the following definitions will apply:

- 2.1. School - The BRIT School
- 2.2. CCTV - Closed Circuit Television System, which includes digital and analogue recordings
- 2.3. Security - The BRIT School Security Team: Site Manager, Director of IT, Front of House Manager
- 2.4. Data Controller - The BRIT School

3. Scope

This code of practice applies to all employees and students of The BRIT School and all employees of contract services. This code does not apply to standalone webcams or cameras that will be used solely for teaching and research. Requests to use such cameras should be sent to the Director of IT (after completing a CCTV Impact Assessment Form, which can be found in the Data Protection Section of the Staff Handbook).

4. Ownership and operation of the CCTV System

The CCTV system is operated by Security whose personnel are employed directly by The BRIT School. The CCTV system, all recorded material and copyright is owned by The BRIT School.

5. Principles

The following principles will govern the operation of the CCTV system.

1. The CCTV system will be operated fairly and lawfully and only for the purposes authorised by The BRIT School;
2. The CCTV system will be operated with due regard for privacy of the individual;
3. Any changes to the purposes for which the CCTV system is operated will require the prior approval of the Principal and will be publicised in advance.

6. Purpose of the CCTV system

The system is intended to provide an increased level of security in the School environment for the benefit of those who study, work, or visit the school.

The CCTV system will be used to respond to the following key objectives, which will be subject to annual assessment:

- To detect, prevent or reduce the incidence of crime
- To prevent and respond effectively to all forms of harassment and public disorder
- To improve the operational response of security patrols in and around the areas where CCTV operates
- To create a safer community
- To gather evidence by a fair and accountable method
- To provide emergency services assistance
- To assist with health & safety
- To investigate suspected breaches of School regulations.

The confidence of the school community in the system is essential. Therefore, all cameras will be operational. An appropriate maintenance programme is in place.

6.1. System details

The CCTV system consists of overt cameras situated on School property, which continuously record activities in the area of coverage. All systems are recording 24 hours a day but not all are monitored around the clock.

7. Data Protection

Recorded images of living, identifiable individuals constitute personal data under the Data Protection Act. As such, the principles of Data Protection will be adhered to and any future changes of legislation will be taken into account.

The use of CCTV is listed in the School's notification with the Information Commissioner's Office (<https://ico.org.uk/ESDWebPages/Entry/Z646982X>).

8. Covert cameras

Use of covert cameras will only be authorised by the Principal under legal advice, in exceptional circumstances where there is reason to suspect criminal activity or a serious breach of School regulations and notification of the monitoring would be likely to prejudice the prevention or detection of that activity. The period and scope of the monitoring will be as narrow as possible to allow investigation of the alleged offence and the monitoring will cease as soon as the investigation is complete. Only information gathered in relation to the alleged offence will be retained. This information will only be viewed by those for whom access is strictly necessary, for example in relation to potential disciplinary proceedings. A CCTV Impact Assessment Form must be completed and authorised prior to installation, which can be found in the Data Protection Section of the Staff Handbook.

9. Access to information

The Freedom of Information Act and the General Data Protection Regulation will be adhered to in relation to requests for access to CCTV footage. Any request for disclosure of information must be made to the Data Protection Officer (dpo-brit@brit.croydon.sch.uk).

Access to the CCTV monitors and recorded/live footage will be prohibited except for lawful, proper and sufficient reasons (e.g. official visits from law enforcement or inspection agencies, security staff, cleaning staff, etc.) and only then with the personal authority (verbal or written) of the Principal, Director of Finance, Site Manager, or Director of IT. Any such visits will be conducted and recorded in accordance with the procedural manual.

All visitors given access to view recorded/live footage will be required to sign a declaration of confidentiality.

10. Requests to view footage

All requests to view CCTV footage will be dealt with in accordance with the General Data Protection Regulation 2018 and Freedom of Information Act 2000:

- Subject access requests Form – <https://www.brit.croydon.sch.uk/page/?title=Subject+Access+Requests&pid=254>
- Freedom of Information requests – www.brit.croydon.sch.uk/foi

Requests for information by the Police and other authorities must be accompanied by the relevant Data Protection form duly signed by the appropriate authority, and must be made through the Data Protection Officer. Disclosures in relation to the prevention or detection of crime and the apprehension or prosecution of offenders may occur without the consent of individuals under Article 23, section 1.d. of the General Data Protection Regulation (EU) 2016/679 (GDPR).

Internal requests to view CCTV, for instance in relation to a disciplinary investigation, should be made to the Site Manager, or Director of IT, clearly setting out why the request is being made and how it might assist the investigation.

Footage may be accessed without the above authorisation in emergencies where it is vital that the footage is made available immediately. A Data Protection form must still be obtained to document that the access occurred.

11. Public Information

A copy of this code of practice will be published on our website (www.brit.croydon.sch.uk/policies), and made available to anyone on request.

12. Signage

Signs are placed in the locality of the cameras. The signs indicate:

- The presence of monitoring and recording
- The purpose of monitoring and recording
- The ownership of the system
- Contact telephone number

13. Complaints

Any use of the CCTV system or materials produced which is outside this code and is inconsistent with the objectives of the system will be considered gross misconduct. This includes the unauthorised use of webcams.

Misuse of the system will not be tolerated; continuing public support is vital. Any person found operating outside these codes without good and reasonable cause will be dealt with under the School disciplinary procedure. If any breach constitutes an offence under criminal or civil law then court proceedings may be taken.

Any complaint concerning misuse of the system will be treated seriously and investigated by the Principal (or deputy) and the Data Protection Officer. The Principal (or deputy) and the Data Protection Officer will ensure that every complaint is acknowledged in writing within seven working days which will include advice to the complainant of the inquiry procedure to be undertaken.

Where appropriate the Police will be asked to investigate any matter recorded by the CCTV system, which is deemed to be of a criminal nature.

14. Major incidents

In the event of a major incident arising, such as serious public disorder, bomb threats/explosions, or serious fires the police will be given authority to supervise the CCTV system. Such authority will be given by the Principal (or deputy) verbally or in writing.

15. Retention

CCTV footage will be retained for a maximum of 30 days, except in cases where a copy has been made in relation to a police investigation. These copies may be held for up to 12 months.

16. Disposal

The disposal of footage will take place in accordance with the School's Disposal of computer equipment and secure erasure of data guidance.

17. Review

This code of practice will be reviewed annually.

18. Contacts

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