



# MALET LAMBERT

## CCTV Code of Practice

<b>Effective Date:</b>	<b>24/06/2024</b>
<b>Date to be Reviewed:</b>	<b>24/06/2026</b>
<b>Contact Officer:</b>	<b>Mr Gavin Salter, Site Manager</b>

### 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	Recycle room towards Canteen	Main Canteen Server	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	Static	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 HR office	Doors	Static	Theft / Damage / Violence / Breaches of Security
018	Ground	Food Tech	Lift	Static	Theft / Damage / Violence
019	Ground	MLF Student 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	Ground Floor English Forum	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 Ground Floor English	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 path	Rear	Static	Theft / Damage / Violence / Breaches of Security
058	PE External	Entrance near PE staffroom	Boiler house path	Static	Theft / Damage / Violence / Breaches of Security
059	PE External	Near double doors forE entrance to changing rooms	MUGA	Static	Theft / Damage / Violence / Breaches of Security
060	PE External	Corner of PE / Geog staffroom	Side path of staffroom	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 Tech	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 school entrance	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 opposite MUGA 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 student path to PE student Entrance	Playground path	Static	Theft / Damage / Violence / Breaches of Security
076	Car Park	Camera pole looking at sports field	Sports Field	PTZ	Theft / Damage / Violence / Breaches of Security/Crime
077	Car Park	Near Energy Centre	Car park	Static	Theft / Damage /

					Violence / Breaches of Security/Crime
078	Semi Circle	B. B. Court	Playground	Static	Theft / Damage / Violence / Breaches of Security/Crime
079	PE External	Corner of PE / Geog Staffroom	Facing footbath in front of Geog classrooms	Static	Theft / Damage / Violence / Breaches of Security
080	Main External	Outside 1.0.33 looking towards old entrance gate	Front of school	ptz	Theft / Damage / Violence / Breaches of Security
081	Dearing	Below 1.1.34 towards external Auditorium	Playground	Static	Theft / Damage / Violence / Breaches of Security
082	Main External	Above old reception facing old caretakers house	Front of School	Static	Theft / Damage / Violence / Breaches of Security
083	Main External	Above old reception facing pupil entrance	Front of School	Static	Theft / Damage / Violence / Breaches of Security
084	Main External	In the Quad above fire doors closest to lift	Playground	Static	Theft / Damage / Violence / Breaches of Security
085	Main External	Quad under the canopy	Playground	Static	Theft / Damage / Violence / Breaches of Security
086	Main External	Outside the corner of Art facing the Auditorium	Playground	Static	Theft / Damage / Violence / Breaches of Security
087	Dearing	Outside Dearing facing the DT classrooms	Playground	Static	Theft / Damage / Violence / Breaches of Security
088	Main External	Above DT Technician room facing the canopy and bin storage	Playground	Static	Theft / Damage / Violence / Breaches of Security
089	Main External	Above external double doors near the recycle room		Static	Theft / Damage / Violence / Breaches of Security
090	PE External		Playground & Basketball Court	Static	Theft / Damage / Violence / Breaches of Security
091	Main External	Camera pole on the basketball court	Playground & External Gym	Static	Theft / Damage / Violence / Breaches of Security

092	PE External	Corner of Activity Studio	Car Park	Static	Theft / Damage / Violence / Breaches of Security
093	Main External	Corner of 2 <sup>nd</sup> floor landing	Landing	Static	Theft / Damage / Violence / Breaches of Security
094	PE External	External Vehicle Gate	Facing fire exit doors	Static	Theft / Damage / Violence / Breaches of Security
095	PE External	Corner of new PE Hall	Facing visitor carpark	Static	Theft / Damage / Violence / Breaches of Security
096	PE External	Corner of new PE Hall	Facing disabled parking bays	Static	Theft / Damage / Violence / Breaches of Security
097	PE External	Corner of new PE	Facing Energy Centre	Static	Theft / Damage / Violence / Breaches of Security
098	PE Internal	Above the double doors near room 3.0.04	Facing towards staffroom	Static	Theft / Damage / Violence / Breaches of Security
099	PE Internal	Above the double doors near room 3.0.04	Facing towards double doors near changing room doors	Static	Theft / Damage / Violence / Breaches of Security
100	PE Internal	Corner of corridor above changing room doors	Facing External doors towards MUGA	Static	Theft / Damage / Violence / Breaches of Security
101	PE Internal	Near Toilets	Facing corridor for new PE hall	Static	Theft / Damage / Violence / Breaches of Security
102	PE Internal	Above fire exit doors	PE Toilets	Static	Theft / Damage / Violence / Breaches of Security
103	Shed 1		Tables	Static	
104	Shed 2		Tables	Static	
105	Sports Corridor	Disabled Toilets		Static	
106	Step Room 1 & 2		classroom	Fisheye	
107	House CCTV	Downstairs Living Room	classroom	Static	
108	House CCTV	Kitchen look at door		Static	
109	House CCTV	1 <sup>st</sup> Floor	landing	Static	

110	House CCTV	Room 1	Classroom	Static	
111	House CCTV	Room 2	Classroom	Static	
112	House CCTV	Room 3	Meeting room	Static	
113	House CCTV	Hall looking at stairs	Landing	Static	
114	House CCTV	Back garden facing disable slope		Static	
115	House CCTV	Facing Grass Area		Static	
116	House CCTV	Side of House facing Yard		Static	

## 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 I.0.43 and the recording equipment is also located in room I.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 administrators 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	Ross Kemp, IT Manager	Full Access
7	Luke Teal, IT Technician	Full Access
8	Keith Wride, IT Technician	Full Access
9	Patrick Sprakes, Headteacher	View Only
10	Steven Fenna, Deputy Headteacher	View Only
11	Stephen Logan, Deputy Headteacher	View Only
12	Keri Pearson, Assistant Headteacher	View Only
13	Pamela Tarbet, Assistant Headteacher	View Only
14	Stuart Beadle, Head of House	View Only
15	Jonny Robinson, Head of House	View Only
16	Dan Midgley, Head of House	View Only
17	Dawn Harrison, Head of House	View Only



18	Cara Mathews, Head of House	View Only
19	Leanne Race-Wordsworth, Head of House	View Only
20	Kerry Palmer, Deputy Head of House	View Only
21	Arron Whelpton, Deputy Head of House	View Only
22	Katie Moore, Deputy Head of House	View Only
23	Dee Mills, Deputy Head of House	View Only
24	Josh Clackstone, Deputy Head of House	View Only
25	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



## II. 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