

LYCÉE INTERNATIONAL DE LONDRES

WINSTON CHURCHILL

(The “School”)

Policy #28: CCTV Policy & Codes of Practice

Mission

Through a rigorous, bilingual programme and innovative methods, we educate pupils to become responsible, creative, and principled global citizens. We teach them to think critically and act ethically, to form and express their own opinions and respect those of others, to define their own life goals, and to make sense of and embrace change.

Our values are excellence, creativity, integrity, awareness and community.

In support of these aims and values we are committed to ensuring the following:

Introduction

The CCTV control room is a dedicated room located in the Legacy building undercroft. Additional monitoring capabilities are located at reception.

The purpose of the CCTV system at Lycee International de Londres (LIL) is to ensure the security and safety of the students, staff, and visitors to the School in addition to securing the property itself. It is designed to provide an additional level of technical support and intelligence to the day-to-day security systems already in place in the school, and thereby underpin the security policy of the School.

The implementation and operation of the CCTV system follows the ICO 2008 Code of Practice. It covers the entire school property. A separate document contains the

operational requirements for the positioning of each camera within the system. The system is operated in compliance with the guidelines of Data Protection regulations.

The CCTV system of LIL will not be used for any purposes other than those stated in this document. It will not be used commercially or for entertainment. Although the cameras may at times be focused on individuals and/or specific activities, this will be for the goals stated above rather than for any other purpose.

Appropriately, trained and supervised personnel, following the guidelines set down for use of the system, will operate the system. Any images recorded by the system will be used for safety, security, and law enforcement purposes only.

The system is owned by the school and operated under the direction of the school at all times. Signage is displayed in accordance with guidelines.

1. Objectives

The CCTV system at LIL has been established to help provide an increased level of security in the school environment for the benefit of those who study, work or visit the school. In particular, the system has the following specific aims.

- To help provide a safe environment for all LIL occupants
- To deter offences against people and property, and to help maintain good order
- To provide quality pictures sufficient to monitor activity in and around the school
- To provide evidence to assist in the prosecution of offenders if necessary
- To provide evidence from the CCTV system and its operators to enable the Police and/or LIL occupants to take civil and criminal action in court if necessary
- To assist with the effective management of the school's security
- To detect acts of criminal damage and unruly behavior at LIL caused by occupants, visitors and/or contractors
- To assist with the management of health and safety concerns

2. Operational Guidelines (Code of Practice)

CCTV is the responsibility of the Premises & Security Manager, Judith Ruhl (020 3824 4921). The Security Supervisor (Safe4U) is Mr. Marc Mimouni, Tel: 07397 303265. In his absence Mr. Guy Yedid, Safe Security Ltd Director, will undertake the overall duties: 07903 262383.

The Security Supervisor has overall responsibility for the CCTV on behalf of LIL and liaises with the COO & Premises & Security Manager.

3. CCTV Management

- Manages and supervises the CCTV system on behalf of LIL
- Communicates with the School
- Liaises with Police and other agencies as required
- Arranges viewings of recordings of incidents which, in his judgment, may be so viewed
- Receives and approves requests from other parties to view the system / recordings
- Ensures the adequacy of procedures for transfer of recordings used in evidence and, in particular, to preserve the continuity of evidence
- Advises on the operational use of the system
- Ensures that effective monitoring and evaluation of the system in accordance with this Code of Practice
- Ensures effective updates/maintenance/repair of all parts of the system
- Ensures the effective training and supervision of the CCTV operators
 - Regularly audits/supervises the operation of the scheme and this Code of Practice

Regular audits/supervision will include:

- a) An examination of CCTV Room records
- b) A spot check on the contents of recorded discs
- c) Equipment performance

4. CCTV Operator

- To monitor the CCTV wall continuously with the intention of detecting incidents as they occur.
- On detecting an incident, watch closely the occurrences
- Record the same on the appropriate incident recorder

- Radio the appropriate team member(s) where available to counteract the problem
- Record the incident details in the Incident Log Book provided
- Notify the police by telephone if necessary
- Ensure the system is working to the required standard and that all recordings are securely stored in accordance with the Code of Practice
- To notify the Security Supervisor when additional recording discs are required
- Management of Operator Log Books are required
- To notify the Security Supervisor of any repair or maintenance requirements of the CCTV equipment
- To maintain the repair and maintenance log book
- To keep the control room in a clean and tidy condition
- To supervise entry into the CCTV Room in accordance with the Code of Practice
- To ensure that the times being shown by all recorders are the same. Operators must carry out regular adjustments when necessary and it is the responsibility of each operator to ensure at the beginning of each shift that the times are correct
- Prevent the unauthorised viewing of personal data (CCTV images) by visitors to the CCTV room

5. Operators' Logs: Written Reports

The Security Supervisor will ensure that the Operators are properly trained in report writing to ensure that all written reports of particular incidents contain the following information:

- Time at which the incident was first noticed
- How the incident was first noticed, e.g. by operator observation, by a team member, by police request
- Description i.e. number of persons, gender, approximate ages, and actions of individuals
- Sequence of events and where possible, the approximate time of each event
- Description of the Police response or other response to the incident
- Report of final outcome of the incident

6. Operator Training

All operators must attend and complete a course providing a certificate for CCTV Control Room Operatives, authorized by the SIA. Upon completion of the course, the Operators will be able to:

- Describe the duties and responsibilities of a CCTV Operator
- Explain the limitations of CCTV surveillance
- Explain the relevant legislation pertinent to the work of a CCTV Operator
- Describe the purpose of and principles upon which CCTV security systems work
- Explain and demonstrate ability to undertake CCTV Room duties

7. CCTV Operations

- Safe4U will be required to supply one CCTV operator to cover daytime activities. Following that, the Safe4U night guard will resume until the day shift commences. Operational cover is seven days a week at LIL.
- LIL reserves the right to seek the removal of any employee of Safe Security Ltd who, in the opinion of the school and in consultation with the Premises & Security Manager, becomes unsuitable for their position.
- Any absence by an employee of LIL will be covered by:
 - Extending the tour of duty of one or more CCTV operators
 - and/or the employment of a relief CCTV Operator from Safe Security Ltd who is trained to the SIA standard and authorized by LIL
- Safe Security Ltd will ensure that management visits take place on a regular basis and will notify the Security Supervisor in advance, with a schedule of dates and times of these visits. The Security Supervisor undertakes not to pre-warn the CCTV Operator of such visits.
- Safe Security Ltd will provide Operator Log Books for use by their employees and will ensure their completion in accordance with procedures specified in this Code of Practice and will ensure that copies of completed logs will be made available to the Premises & Security Manager and LIL staff.

8. CCTV Operational Restrictions

The CCTV System may not be used in the following circumstances:

- Where the material being recorded is not of a criminal nature but could, if viewed by a third party, cause offence
- Where the privacy of individuals would be clearly violated provided a criminal offence is not taking place
- Where the recording consists substantially of the interior of a private property

Any unauthorized use of the CCTV system for any purpose whatsoever will be considered as gross misconduct and result in the dismissal of the individual.

9. Entry to the CCTV Control Room

The Security Supervisor will notify LIL of those persons who may gain entry to the CCTV Control Room without prior consent from him.

A record will be kept of visitors to the CCTV Control Room where the visit is more than momentary.

10. Recorded Copies Procedures

Ownership

Ownership and copyright of recorded material remains with LIL. Any copies made will have the copyright vested as though it was the master copy.

Recording

The CCTV system is supported by digital recording facilities which will function throughout the operations. In addition, digital storage is available for instant operation and recording of incidents.

General Recordings Procedures and Use

All recordings are stored on the CCTV hard drive, which is in the Server Room. Access and copying of data is limited to the Security Supervisor & CCTV Operator and those people authorized by the school or the Manager.

Copies will not be sold, released, nor used for commercial purposes or for the provision of entertainment.

As previously stated above, the purpose of the CCTV system is to deter crime and, where that fails, to provide quality evidence to aid detection and conviction. The use of recorded copies in a Police investigation and a subsequent prosecution in the courts could be of vital importance. The management of recorded copies within the CCTV Room is therefore of highest importance.

Copies will be stored and clearly referenced. Reference numbers must be unique and should assist in identifying the following information from the disc label:

- The recorder in which it was used
- The date and time on when it was used
- The camera number(s)

Copies may not be stored anywhere other than in the CCTV Room or the Premises & Security Manager's office with the exception of the descriptions below.

Recorded Copies (Evidence)

The ONLY occasions where recorded copies can be removed from the CCTV Room without reference to the Security Supervisor is when Police Officers wish to seize the recording(s) for use as evidence in Court.

The Police Officers have to supply a CAD or unique reference number to be listed in the log against disc supplied. If requested, a written statement should also be prepared / supplied in conjunction and must be signed and dated by the Operator.

11. System Reviews

Requests from the Police for a system review may be carried out without reference to the Security Supervisor. Requests for a system review from any other source must be referred to the Security Supervisor in writing and should only be approved by the Security Supervisor with written authority (this request log may be electronic).

ALL requests for a system review must be recorded in the Operator's Log (the Operator's Log may be electronic), together with the Operator's response to that request. Where the request is NOT from a Police Officer, the date and time the request was referred to the Supervisor should be stated, together with a note of the Supervisor's decision and the date / time of when the decision was received.

When a system review has been carried out, the result must be recorded in the System Review Log and referred in the Operator's Log, the requirements are as follows:

- The date and time the request for a system review was made
- The date, time, and location of the incident being investigated
- A brief description of the incident being investigated
- The name of the person who made the request for the system review.
- The operator's response
- All action as a result of the review
- The overall results

If the Police want to carry out their own reviews, the following should be noted in Operator's Log:

- The date and time the Police were permitted entry into the CCTV Room
- The information reviewed by the Police Officer should be noted
- The date and time the Police Officer completed the review and left the CCTV Room

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 room.

In the case of a dispute, the Security Supervisor will pass all disputed requests to the Premises & Security Manager.

12. Still Photographs

Still photographs will not be taken without sufficient reason. Any Operator taking a still photograph must bear in mind that the existence of such photographs must be capable of justification. Still photographs may be taken from digital recordings but the taking of such photographs must be recorded in the CCTV Log book. Should the Security Supervisor grant third party requests for still photographs, details of the person making the request must be noted in the Logbook and approval.

All still photographs obtained from the CCTV System will remain the property of LIL. A written record will be maintained in the CCTV Log book of the destination of all still photographs. Any still photographs that are permitted to leave the CCTV Room must be signed for by the recipient.

Copies of still photographs retained in the CCTV Room will be filed by date and will be destroyed after 31 days and, when so destroyed, the Operator will make a note to that effect in the CCTV Log book.

12. Body Worn Video (BWV) Systems

BWV involves the use of cameras that are worn by a person and are usually attached to their clothing or uniform. These devices can often record both visual and audio information. Where BWV systems are used by mobile patrols, they will be subject to the same principles in this policy.

A log should be kept when a BWV is deployed and in particular where it is used for recording purposes, to ensure its use is lawful and proportionate e.g., It may be appropriate for a patrolling guard to switch on their BWV camera when they believe an individual is being aggressive or there is the potential for aggression. However, it would not be appropriate to switch it on when an individual is merely asking for help or directions.

13. Data Protection Act 1998

The nine principles (as listed below) of the Data Protection Act 1998 will be adhered to, and any future changes of legislation will be taken into account.

- Obtain and process personal data fairly and lawfully
- Obtain, hold and use data only for the purposes specified
- Use the data only for the purpose, and disclose only to the people, shown within these policies and procedure
- Only hold data which is adequate, relevant and not excessive in relation to the purpose for which the data is held
- Ensure personal data is accurate and, where necessary, kept up to date
- Hold data for no longer than is necessary
- Personal data will be processed in accordance with the rights of data subjects under the Data Protection Act 1998
- Take security measures to prevent unauthorized or accidental access to, alteration, disclosure, or loss and destruction of information
- Personal data will not be transferred outside the EEA without ensuring there is an adequate level of protection in relation to the processing of personal data

14. Assignment Instructions

Safe Security Ltd will supply written assignment instructions to each CCTV Operator. The assignment instructions must contain detailed advice on the following topics:

- Customer's name and address, telephone number, location, dialing procedure
- Alternative Telephone/Communications
- Customer working hours, hours of duty incl. late/early Workers
- Handover/Take-over procedures
- Emergency Procedures & Emergency Contacts
- Telephone Bomb Warnings or Suspect Packages procedures
- Equipment - Maintenance Logs
- Camera Patrols and Random Checks
- Incident Reporting Procedures
- Health and Safety Hazards
- First Aid Equipment
- Accident/Personal Injury
- Operator Duties & Operator Guide
- Access Control
- Special Instructions & temporary Instructions
- Confidentiality of Information
- Code of Conduct

15. Subject Access Requests

Any requests received by any individual for data recorded by the CCTV systems at LIL should be managed in accordance with the Privacy Notices Policy (#12).

Requests and enquiries should be directed to the Compliance & Privacy Officer at gdprcompliance@lyceeinternational.london

16. Annual Review

The Security Supervisor will report an Annual Review of the activities of the CCTV System to the School if required.

Day-to-Day Management is a collaboration between Safe Security Ltd. and Lycee International de Londres Winston Churchill.

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Policy reviewed in

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- June 2022
- July 2021
- July 2018