

The American School in London

CCTV Policy

The current version of any policy, procedure, protocol or guideline is the version held on the ASL website. It is the responsibility of all employees to ensure that they are following the most up-to-date version.

Responsible party	Director of Technology
Approved by	Board of Trustees
Responsible board committee	Buildings & Grounds
Approval date	March 2025

Overview

The CCTV control room is located in Red level 2 (opposite the security manager's office). A monitor is located at each reception area. The supervisor/security manager monitors the screen for any suspicious activity.

The purpose of the CCTV system at the American School in London (ASL) is to help ensure the security and safety of the students, employees and visitors to the School, together with the security of 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, and thereby underpin the security policy of the School.

The purpose of the CCTV system is to:

- enhance overall security and safety
- assist in the protection of the School and its occupants
- help deter potential offenders
- help to identify any potentially dangerous activities or individuals

The implementation and operation of the CCTV system follows the updated ICO 2013 code of practice. It covers the entire school property including the Waverley Place campus and Canons Park playing fields. 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 the Data Protection Act 2018.

The ASL CCTV system will not be used for any purposes other than those stated here. 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.

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

Signage is displayed in accordance with guidelines, and to help achieve maximum crime prevention value.

The system is owned by the School and operated under the direction of school administrators at all times.

System objectives

The ASL CCTV system 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 ASL occupants
- Deter offenses against people and property, and to help maintain good order
- Provide quality pictures sufficient to monitor activity in and around the School
- Provide evidence to assist in the prosecution of offenders if necessary
- Provide evidence from the CCTV system and its operators to enable the police and/or the ASL occupants to take civil and criminal action in court where necessary
- Assist with the effective management of school security
- Detect acts of criminal damage and unruly behavior at ASL caused by occupants, visitors and/or contractors
- Assist with the management of health and safety concerns

Operational guidelines (code of practice)

Supervisor

The supervisor of the ASL CCTV system is the security manager. In the absence of the security manager, supervisory duties will be undertaken by Safe4U Ltd. director. The supervisor works on behalf of ASL and reports to the director of operations.

The supervisor of the CCTV system:

- manages and supervises the CCTV system on behalf of ASL and other members of the CCTV team
- communicates with the School
- liaises with police and other agencies as required

- arranges for the viewing of recordings of incidents which, in their judgment, may be so viewed
- receives and, where appropriate, approves requests from other parties to view the system
- ensures the adequacy of procedures for the transfer to other parties of recordings that are to be used as evidence, in particular to ensure those procedures preserve the continuity of evidence
- advises on the operational use of the system
- ensures that effective monitoring and evaluation of the system takes place in accordance with the guidelines contained in this document.
- ensures effective repair and maintenance of all parts of the system (including system updates)
- ensures the effective training and supervision of the CCTV operators through coordination with ASL
- regularly audits/supervises the operation of the scheme and this document
Regular audits/supervision will include:
 - an examination of CCTV room records
 - a spot check on the contents of the recorded hard drives
 - equipment performance

CCTV operators

The role of the CCTV operator is to:

- monitor all incidents on the video wall continuously with the intention of detecting incidents as they occur
- ensure that the system is working to the required standard and that all recordings are securely stored in accordance with current regulations
- notify the CCTV supervisor when additional recording storage is required
- notify the security manager when operator log books are required
- notify the security manager of any repair or maintenance requirements of the CCTV equipment
- maintain the repair and maintenance log
- keep the control room in a clean and tidy condition
- supervise entry into the CCTV room in accordance with current regulations
- ensure that the times 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)

And on detecting an incident, to:

- monitor closely the occurrences on the appropriate desk monitor
- 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

Operators' logs: written reports

The supervisor will ensure that the operators are properly trained in report writing and that all written reports of particular incidents contain the following information:

- the 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, etc.
- what was seen, e.g., number of persons, gender, approximate ages and actions of individuals
- the sequence of events and, where possible, the approximate time of each event
- description of the police response or other response to the incident
- description of the final outcome of the incident

Operator training

All operators must attend and complete a certificate course for CCTV control room operatives, authorized by the SIA. Upon completion of the course, operators will be able to:

- describe the duties and responsibilities of a CCTV control room operator
- explain the limitations of CCTV surveillance
- explain the relevant legislation pertinent to the work of a control room operator
- describe the purpose of and principles upon which CCTV security systems work
- explain and demonstrate ability to undertake CCTV room duties

Control room operations

Responsibilities of Safe4U Ltd.

- Safe4U will be required to supply two CCTV operators per eight-hour shift to cover 16 hours per day (the eight hours left are to be provided by in-house security team and assisted by the Safe4U night guard), seven days per week in the CCTV room located at ASL.
- ASL reserves the right to seek the removal of any employee of Safe4U Ltd. who, in the opinion of the School and in consultation with the supervisor, is or becomes unsuitable for the position.
- Any absence by an employee of ASL will be covered by:
 - o extending the tour of duty of one or more CCTV operators and/or
 - o the employment of a relief CCTV operator (from Safe4U) who is trained to the SIA standard and authorized by ASL
- Safe4U Ltd. will ensure that management visits take place on a regular basis and will, in advance, furnish the supervisor with a schedule of dates and times when those management visits will occur. The supervisor undertakes not to pre-warn the CCTV operators of such visits.
- Safe4U Ltd. will provide operator log books for use by their employees and will ensure their completion in accordance with procedures and will ensure that copies of completed logs are made available to the supervisor and ASL employees on a daily basis.

CCTV operation 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 offense
- Where the privacy of individuals would be clearly violated provided a criminal offense 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 CCTV operator.

Entry to the CCTV control room

The supervisor will notify ASL of those persons who may gain entry to the CCTV control room without prior consent from the supervisor.

Recorded disk procedures

Ownership

Ownership and copyright of recorded material remains with ASL. Any copies made will have the copyright vested as though it were the master disk.

Recording

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

General disc procedures and use

All recordings are stored on the CCTV hard drive, which is in the server room. Access and copying of data onto disks is limited to the security manager and those people authorized by the School or the manager.

The supervisor will maintain a detailed log tracking.

Disks will not be sold, released or 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 discs in a police investigation and a subsequent prosecution in the courts could be of vital importance. The management of recorded disks within the CCTV room is therefore of importance.

Disks will be stored in the equipment provided for the purpose and will be filed in a logical order to facilitate identification of particular disks. Disk reference numbers must be unique and should assist in identifying the following information from the disk label:

- The recorder in which it was used
- The date and time when it was used

- The camera number(s)

The label displayed on the disk must be sufficient to ensure swift retrieval of appropriate material as and when required.

Disks may not be stored anywhere other than in the CCTV room or the security manager's office with the exception of the descriptions below.

Recorded disks to be used for evidence

The only occasions on which a recorded disk can be removed from the CCTV room without reference to the security manager are when a police officer wishes to seize the disk(s) to be used as evidence in court. Operators must strictly adhere to the following procedure:

- All recorded discs on which the appropriate image has been recorded must be retained.

It is important to ensure that the times being shown by all recorders are the same. Operators must carry out regular adjustment when necessary and it is the responsibility of each operator to ensure at the beginning of each shift that the times are correct.

When an incident has been recorded and the police request retention of the disk(s) for evidential purposes the operator will:

- ensure that all recorded segments may only be removed from the CCTV server after a police officer has signed for those disks
- ensure that statements are prepared, which must be signed by the operator and police officer, to accompany the disks

If more information is required, the security manager should be contacted.

System reviews

Requests from the police for a system review may be carried out without reference to the supervisor. Requests for a system review from any other source must be referred to the supervisor in writing and should only be carried out on the supervisor's specific written authority.

All requests for a system review must be recorded in the operator's log, 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 at which the decision was reached.

To be used where CCTV operators carry out system reviews:

When a system review has been carried out, the result of that review must be recorded in the system review log. Reference to that entry should be made in the operator's log.

The following information must always be recorded in the system review log:

- 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 which were taken by the operator as a result of the review
- The results of the review

To be used where police officers carry out their own system reviews:

The date and time the police officer was permitted entry into the CCTV room for the purpose of a review should be recorded in the operator's log. The information reviewed by the police officer should be noted in a report form. The date and time the police officer completed the review and left the CCTV room should be similarly recorded.

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.

Still photographs

Still photographs will not be taken without sufficient reason for doing so, and an 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 requests for still photographs be made by third parties, details of the person making the request must be noted in the log book and approval must be granted by the security manager.

All still photographs obtained from the CCTV system will remain the property of ASL. 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.

Data Protection Act 2018

The nine principles of the Data Protection Act 2018 will be adhered to, and any future changes of legislation will be taken into account.

These principles are:

- 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 that 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 2018
- 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.

Issue of assignment instructions

Safe4U Ltd. will supply written assignment instructions to each CCTV operator. The assignment instructions will contain detailed advice on the following topics:

- Customer's name and address
- Telephone number, location, dialing procedure
- Alternative telephone/communications
- Hours of duty
- Handover procedures
- Emergency procedures
- Emergency contacts
- Telephone bomb warnings or suspect packages
- Equipment, maintenance logs
- Camera patrols and random checks
- Incident reporting procedures
- Health and safety hazards
- First-aid equipment
- Accident/personal injury
- Operators duties
- Access control
- Customer's normal working hours
- Late/early workers
- Special instructions
- Temporary instructions
- Confidentiality of information
- Code of conduct
- Operators' guide

Day-to-day management

This will be a collaboration between Safe4U Ltd. and ASL.