

## CCTV policy

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## Introduction

1. The school uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitor the academy buildings and grounds in order to provide a safe and secure environment for its pupils, staff and visitors, and to prevent loss or damage to academy property and surrounds. This policy outlines the academy's use of CCTV and how it complies with the General Data Protection Regulation; it is to be read in conjunction to the academy's data protection policy.
  - a. The system comprises a number of fixed and dome cameras.
  - b. The system does/does not have sound recording capability.
  - c. The system is/is not linked to staff or pupil attendance records.
  - d. The system is not linked to automated facial recognition or number plate recognition software thus all individuals' images are anonymous until viewed.
2. The CCTV system is owned and operated by the academy, the deployment of which is determined by the academy's leadership team / Trust's Director of Estates.
3. The CCTV is monitored securely from the Security office. The academy server stores the images and is retained on-site. Access to the images is controlled by the Premises Manager, or in his absence, The Deputy Premises Manager and is password protected.
4. The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and members of the academy community.
5. The CCTV Scheme is included in the academy's registration with the Information Commissioner as a data processor.
6. All authorised operators and employees with access to images are aware of these procedures that need to be followed when accessing the recorded images. Through this policy, all operators are made aware of their responsibilities in following the CCTV Code of Practice. The Executive Principal will ensure that all employees are aware of the restrictions in relation to access to and disclosure of, recorded images by publication of this policy.

## Statement of Intent

7. The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:
  - a. <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>
8. The academy's CCTV surveillance cameras are a passive technology that only records and retains images. They are not linked to automated decision making or facial or number plate recognition software. Transmission is by cable direct to the server.
9. CCTV warning signs are clearly and prominently placed at the main external entrance to the academy, including further signage in other outdoor areas in close proximity to camera positions. Signs will contain details of the purpose for using CCTV (see annex B). In areas where CCTV is used, the academy ensures prominent signs are placed within the controlled area.
10. The recordings will be filed with accurate metadata noting the camera location and time of the recording.
11. The original planning, design and installation of CCTV equipment endeavoured to ensure that the scheme will deliver maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

## Siting the Cameras

12. Cameras are sited so that they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated.
13. The academy will make every effort to position cameras so that their coverage is restricted to the academy premises, which includes outdoor/indoor areas. The system design is sympathetic to the privacy of surrounding public and does not monitor public space outside the legitimate areas of interest for the academy.
14. CCTV will not be used in classrooms, but in limited areas within the academy building that have been identified by staff and pupils as not being easily monitored at all times.
15. Members of staff will have access to details of where CCTV cameras are situated.

## **Storage and Retention of CCTV images**

16. Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.
17. All retained data will be stored securely at all times and permanently deleted as appropriate / required.
18. Recorded images will be kept for no longer than 3 months, except where there is lawful reason for doing so, such as discipline investigations. Images are deleted from both the server and back-up server.

## **Access to CCTV images**

19. Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available.
20. Access to stored images will only be granted in the case of an incident. To be viewed in the course of the incident's investigation.

## **Subject Access Requests (SAR)**

21. Individuals have the right to request access to CCTV footage that constitutes their personal data, unless an exemption applies the General Data Protection Regulations.
22. All requests should be made in writing to the Executive Principal. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
23. The academy will respond to requests within one month of receiving the written request and any fee where disproportionate effort is required to adhere to the request.
24. Disclosure of information from surveillance systems must be controlled and consistent with the purpose(s) for which the system was established. When disclosing surveillance images of individuals, particularly when responding to subject access requests, the academy will consider whether the identifying features of any of the other individuals in the image need to be obscured. In most cases the privacy intrusion to third party individuals will be minimal and obscuring images will not be required. However, consideration will be given to the nature and context of the footage.
25. The subject will be supplied with a copy of the information in a permanent form. There are limited circumstances where this obligation does not apply. The first is where the data subject agrees to receive their information in another way, such as by viewing the footage. The second is where the supply of a copy in a permanent form

is not possible or would involve disproportionate effort, whereby the disproportionate effort may incur an administration fee.

26. Further guidance on SARs is within the Data Protection Policy.

### **Access to and Disclosure of Images to Third Parties**

27. There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the academy where these would reasonably need access to the data (e.g. investigators).

28. Requests for images and data should be made in writing to the Executive Principal.

29. The data may be used within the academy's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

30. Data transfer will be made securely and using encryption as appropriate.

### **Complaints**

31. Complaints and enquiries about the operation of CCTV within the academy should be directed to the Executive Principal in the first instance.

32. Further Information

33. [www.ico.org.uk](http://www.ico.org.uk)

## Appendix A – CCTV Checklist

This CCTV system and the images produced by it are controlled by the Premises Manager who is responsible for how the system is used under direction from the academy's Executive Principal. The academy notifies the Information Commissioner about the CCTV system, including any modifications of use and/or its purpose.

The academy has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of the academy's community. It will not be used for other purposes. The academy will conduct regular reviews of our use of CCTV.

	<b>Checked</b> (Date if appropriate)	<b>By</b>	<b>Date of next review</b>
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			
There is a named individual who is responsible for the operation of the system.			
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.			
Staff and members of the academy community will be consulted about any proposal to install / amend CCTV equipment or its use as appropriate.			
Cameras have been sited so that they provide clear images.			
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.			
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).			
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.			

<p>The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.</p>			
<p>Except where individually authorised, images have not been provided to third parties.</p>			
<p>The organisation has a policy for how to respond to individuals making requests for copies of their own images. If unsure the Executive Principal knows to seek advice from the Data Protection Officer at Satswana Ltd.</p>			
<p>Regular checks are carried out to ensure that the system is working properly and produces high quality images.</p>			

<https://ico.org.uk/>

## Annex B – CCTV Signage

It is a requirement of the General Data Protection Regulation to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The academy is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the academy
- The contact telephone number or address for any enquiries



Example sign.