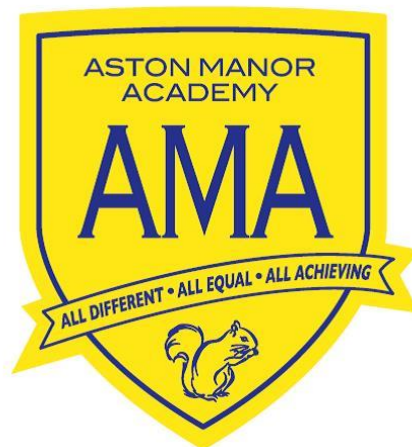


EQUITAS ACADEMIES TRUST



Chilwell Croft
Academy

CCTV POLICY

Review Date: May 2018
To be Reviewed: May 2021
Agreed: F & GP Board
Policy Lead: Marion Lower/Pravina Patel

CCTV POLICY

1. INTRODUCTION

Equitas Academies Trust uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitor the school 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 school property.

The system comprises a number of fixed and dome cameras.

The system does not have sound recording capability, except for in the support room.

The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team / Business Manager.

The CCTV is monitored centrally from:

- the school's office at Chilwell Croft Academy and the hardware station is located within a locked room on the ground floor. Access to the images is controlled by the HT/Business Manager/Site Manager/Supervisor.
- the Caretakers office at Aston Manor Academy and the hardware station is located within a locked room on the ground floor. Access to the images is controlled by the HT/Business Manager/Site Manager/supervisor/IT Manager/co-ordinator.

The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and members of the school community.

The school's CCTV Scheme is registered with the Information Commission who oversee the terms of the Data Protection Act 1998. The use of CCTV, and the associated images are covered by the Data Protection Act 1998. This policy outlines the school's use of CCTV and how it complies with the Act. [The Data Protection Act 1998 is due to be replaced with the GDPR in May 2018]

All authorised operators and employees with access to images are aware of the 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 school's 'Data Controllers' (Head Teacher) 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.

2. STATEMENT OF INTENT

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: <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

The schools will complete a yearly audit of the CCTV systems and procedures as recommended by the ICO (see appendix A)

CCTV warning signs are clearly and prominently placed at all the main external entrance to the school, including further signage in other outdoor areas in close proximity to camera positions. Signs will contain details of the purpose for using CCTV (see appendix B). In areas where CCTV is used, the school will ensure that there are prominent signs placed within the controlled area.

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.

3. SITING THE CAMERAS

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. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act/GDPR.

The school will make every effort to position cameras so that their coverage is restricted to the school premises, which includes outdoor/indoor areas.

Members of staff will have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

4. COVERT MONITORING

It is not the school's policy to conduct 'Covert Monitoring' unless there are 'exceptional reasons' for doing so.

The school may, in exceptional circumstances, determine a sound reason to set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from the trust board before any commencement of such covert monitoring.

Covert monitoring must cease following completion of an investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles, changing areas etc.

5. STORAGE AND RETENTION OF CCTV IMAGES

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.

All retained data will be stored securely at all times and permanently deleted as appropriate/required.

All download requests must be approved and recorded as per appendix C

6. ACCESS TO CCTV IMAGES

Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available.

7. SUBJECT ACCESS REQUESTS (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act/GDPR.

All requests should be made in writing to the Headteacher. 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.

The school will respond to requests within 40 calendar days of receiving the written request and any fee. This is as per the ICO CCTV Code of Practice.

A fee of £10 may be charged per request. This is as per the ICO CCTV Code of Practice.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

8. ACCESS TO AND DISCLOSURE OF IMAGES TO THIRD PARTIES

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 school where these would reasonably need access to the data (e.g. investigators).

Requests for images / data should be made in writing to the Head Teacher.

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

9. COMPLAINTS

Complaints and enquiries about the operation of CCTV within the school should be directed to the Head Teacher in the first instance.

10. FURTHER INFORMATION

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition 2017 (published by the Information Commissioners Office) Version 1.2
- www.ico.org.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998
- GDPR (wef 25 May 2018)

Date of next review: May 2021

Appendix A – Checklist

This CCTV system and the images produced by it are controlled by the Business Manager who is responsible for how the system is used under direction from the schools 'Data Controller'. The school notifies the Information Commissioner about the CCTV system, including any modifications of use and/or its purpose (which is a legal requirement of the current Data Protection Act 1998).

Equitas Trust 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 schools community. It will not be used for other purposes. The school will conduct regular reviews of our use of CCTV.

Chilwell Croft Academy	Checked (Date if appropriate)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Yes.	Business Manager	Feb 2019
There is a named individual who is responsible for the operation of the system.	Yes.	Headteacher	
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.	Yes	Site Supervisor	
Staff and members of the school community will be consulted about any proposal to install / amend CCTV equipment or its use as appropriate.	Yes.	Headteacher	
Cameras have been situated so that they provide clear images.	Yes.	Site Supervisor	
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Yes.	Site Supervisor	
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).	Yes.	Site Supervisor	
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes.	Headteacher, Business Manager Site Supervisor Senior IT co-ordinator	
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.	Yes.	Headteacher, Business Manager Senior IT co-ordinator	
Except for law enforcement bodies, images will not be provided to third parties.	Yes.	Headteacher, Business Manager Senior IT co-ordinator	

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The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the data controller knows to seek advice from the Information Commissioner as soon as such a request is made.	Yes.	Headteacher, Business Manager Senior IT co-ordinator	
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes. (Daily checks)	Office staff, Site Supervisor	

Aston Manor Academy	Checked (Date if appropriate)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Yes	Business Manager	Feb 2019
There is a named individual who is responsible for the operation of the system.	Yes	Headteacher	
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.	Yes	Site Manager, IT Manager and office staff	
Staff and members of the school community will be consulted about any proposal to install / amend CCTV equipment or its use as appropriate.	Yes	Headteacher	
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Yes	Site Manager	
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).	Yes	Site Manager	
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes	Site Manager	
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.	Yes	Site Manager, IT Manager	
Except for law enforcement bodies, images will not be provided to third parties.	Yes	Headteacher, Site Manager, Office staff	
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the data controller knows to seek advice from the	Yes	Headteacher, Site Manager, Office staff	

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Information Commissioner as soon as such a request is made.			
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes	Site Manager, IT, Office staff	Monitored daily

Appendix B – CCTV Signage

It is a requirement of the Data Protection Act 1998 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school 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 school
- The contact telephone number or address for any enquiries



Example sign.

Appendix C – CCTV download request

GDPR CCTV record sheet of downloads

Person requesting the download	
Date of request	
Date of the incident	
Reason for the download	
Start time of download	
Finish time of download	
Footage requested on media	Yes / No
Signature of requester	
HT/BM Approval	