



CONNECTED LEARNING

Closed Circuit Television (CCTV) Policy

Iceni Academy

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**TO BE READ IN CONJUNCTION WITH THE TRUST'S
SURVEILLANCE MANAGEMENT PROCEDURES**

TO

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Connected Learning

CCTV Policy – Iceni Academy

Introduction

This is the Trust's approved policy relating to the use of CCTV. Iceni Academy uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent loss or damage to the school property.

The system comprises 7 fixed cameras and does not have sound recording capability.

The CCTV system is owned and operated by the Trust, the deployment of which is determined by the Trust's Board of Trustees.

The CCTV is monitored centrally from the school office by the Site Manager and Office Manager.

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

The school's CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 2018 (DPA). The use of CCTV, and the associated images and any sounds recordings is covered by the DPA. This policy outlines the school's use of CCTV and how it complies with the legislation.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are trained about their responsibilities under the CCTV policy. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

Statement of Intent

The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use. The Code of Practice is published at:

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

CCTV warning signs will be clearly and prominently placed at reception and external entrances to the school. Signs will contain details of the purpose for using CCTV (see Appendix A). In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

The planning and design has endeavoured to ensure that the system will give 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

Cameras will be sited so they only capture images relevant to the purposes for which they are installed, (as described above), and care will be taken to ensure that reasonable privacy expectations are not violated. The Board will ensure that the location of equipment is carefully considered to ensure that images captured comply with the legislation.

The school will ensure that it positions cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

CCTV will not be used in classrooms but in areas within school that have been identified by staff and pupils as not being easily monitored.

Members of staff should have access to details of where CCTV cameras are situated.

There is no covert monitoring at Icen Academy and it is the Trust's policy to not utilise its CCTV system for covert surveillance activities.

Storage and Retention of CCTV Images

The school retains CCTV images for 3 days.

The school stores CCTV images on the hard drive within the CCTV. It is automatically written over after 3 days.

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. Access is password protected.

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under GDPR.

All requests should be made in writing using the SAR request form available from the Trust's Information Champion. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example, date, time and location.

The school will respond to requests within 1 calendar month of receiving the request.

NB Footage will be over written within 3 days

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

Please see the Subject Access Request policy for further details.

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 by third parties should be assessed using the Trust's Surveillance Recordings Access Request Form – Investigators.

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.

Complaints

Complaints will be dealt with in accordance with the Trust's Complaints Procedure.

Appendix A: CCTV Signage

It is a requirement of the Data Protection Act 2018 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 enquiries.



CCTV Code of Practice Check List

This CCTV system and the images produced by it are controlled by the academy who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998).

The Trust has considered the need for using CCTV and has decided it is required for the prevention and detection of crime and for protecting the safety of our community. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked (DATE)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded	18.6.20	NE	Nov 2020
There is a named individual who is responsible for operation of the system	Mervyn Coe	NE/MC	Jan 2020
The problem we are trying to address has been clearly defined and installing cameras is the best solution. This decision should be reviewed on a regular basis.	Problems being addressed is burglary and vandalism. No site house giving additional security. 18.6.20	NE/MC	Jan 2020
A system has 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	Images can be downloaded within 3 days. Quality is basic – would not be good enough for police prosecutions – advised by TTSS	NE/MC	Jan 2020
Cameras have been sited so that they provide clear images	Yes 18.6.20	NE/MC	Jan 2020
Cameras have been positioned to avoid capturing the images of persons not visiting the premises	Yes 18.6.20	NE/MC	Jan 2020
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 18.6.20 At staff and pupil entrances. Contact details are next to the front door.	NE/MC	Jan 2020
Images from this CCTV system are securely stored where only a limited number of authorised persons may have access to them	Yes 18.6.20	NE/MC	Jan 2020
The recorded images will only be retained long enough for any incident to come to light (eg for a theft to be noticed) and the incident to be investigated	Yes. Images are recorded on a hard drive and recorded over after 3 days. 18.6.20	NE/MC	Jan 2020
Except for law enforcement bodies, images will not be provided to third parties	Confirmed 18.6.20	NE/MC	Jan 2020
The potential impact on individuals' privacy has been identified and taken into account in the use of the system	Confirmed 18.6.20	NE/MC	Jan 2020

The organisation knows how to respond to individuals making requests for copies of their own images. If unsure, the Controller knows how to seek advice from the Information Commissioner as soon as such a request is made	18.6.20	NE/MC	Jan 2020
Regular checks are carried out to ensure that the system is working properly and produces high quality images	Annual maintenance by TTSS 28.2.20	NE/MC	Jan 2020



On cabin



On hall wall



At end of corridor



Front door



Changing area – this has been disconnected as children change here



Other end of corridor



In front lobby



Rear Cabin