

## CCTV Policy

Policy Code:	ICT1
Policy Start Date:	September 2017
Policy Review Date:	September 2020

Please read this policy in conjunction with the policies listed below:

- HR12 Staff Disciplinary Policy and Procedure
- HR5 Acceptable Use Policy – ICT
- HR6 Data Protection Policy
- CCTV Code of Practice – Information Commissioner’s Office

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## **1. Policy Statement**

- 1.1. The Priory Federation of Academies Trust (the Trust) seeks to provide each employee with the direction, development and support necessary to ensure a productive and rewarding career.
- 1.2. The Trust is committed to developing a culture where employees are supported and assisted in achieving the required standards of performance.
- 1.3. The purpose of this document is to regulate and provide guidance for the management, operation and use of the closed circuit television (CCTV) system at The Priory Federation of Academies' sites.
- 1.4. References to the Trust or Academy within this policy specifically include all primary and secondary academies within the Trust, as well as Robert De Cheney Boarding House, the Early Years setting at the Priory Witham Academy, Priory Training, Priory Apprenticeships, Lincolnshire Teaching School Alliance, Lincolnshire Teaching School Alliance SCITT and the French Centre.
- 1.5. This policy does not form part of any employee's contract of employment and it may be amended at any time.

## **2. Roles, Responsibilities and Implementation**

- 2.1. The Pay, Performance and HR Committee has overall responsibility for the effective operation of this policy and for ensuring compliance with the relevant statutory framework. This committee delegates day-to-day responsibility for operating the policy and ensuring its maintenance and review to the Strategic IT Coordinator.
- 2.2. Leaders and Managers have a specific responsibility to ensure the fair application of this policy and all employees are responsible for supporting colleagues and ensuring its success.

## **3. Aims**

- 3.1. The system comprises a number of fixed cameras located around the sites. In some areas, monitoring stations are set up; however, monitors will be positioned where they cannot be viewed by persons other than those authorised, such as secured technical areas or site offices.
- 3.2. This document follows Data Protection Act 2018 guidelines. This document will be subject to review triennially to include consultation with interested parties. A review of this document will also be conducted in the event of significant

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changes to the CCTV system or legislation. The CCTV system is owned by the Trust and some external elements of it are maintained by external contractors.

### 3.3 Objectives of the CCTV system:

- To increase personal safety of all school users and reduce the fear of crime
- To protect the Federation/Academy buildings and assets
- To support the police in a bid to deter and detect crime.
- To assist in identifying, apprehending and prosecuting offenders
- To assist in managing the Academy.

## 4. Statement of Intent

4.1 The CCTV system is used following Information Commissioner Guidance under the terms of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2018 and will comply with the requirements both of the Data Protection Act 2018 and the Commissioner's Code of Practice. The Trust will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.

### 4.2 Cameras will be used:

- To monitor activities within the academies and their grounds to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of all Academy users and visitors. Any recordings made may be viewed and used by authorised persons in line with the ICO CCTV Code of Practice.
- Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Material will not be released to the media and will only be released to the police for the purpose of detection or prevention of crime.
- The planning and design of the CCTV system 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. Warning signs, as required by the Code of Practice of the Information Commissioner, have been placed at entry points to the academies and additional strategic locations within the academies grounds.
- As far as reasonable possible, all CCTV cameras will avoid focusing on any private residences neighbouring the academy sites.

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## 5. Operation of the System

- Administration and management of the scheme is the responsibility of the Trust and these roles are delegated to the Headteacher of each academy, in accordance with the principles and objectives expressed in the code.
- The day-to-day management will be the responsibility of the IT Systems and the Site teams.
- The CCTV system will be operated 24 hours each day, every day of the year.
- Any faults in the operating system are sent to the IT team in an automatic email alert. The technician on duty actions the repair.
- Video screens displaying live pictures must be kept in access-controlled areas visible only to appropriate staff.
- Any requests from staff to view live pictures, watch playback or receive digital exports from the system must be submitted in a formal email request (an IT ticket). Only members of the SLT (or SLT authorised staff) may make these requests; others may view with their approval. It is the responsibility of the **designated member of the ICT service team** to ensure CCTV requests are made formally. The CCTV request ticket must be kept in the ticket system archive.
- Authorised ICT support staff may access the system but only to perform maintenance tasks which have been logged on the ticket system.
- Members of the public e.g. parents, carers or visitors are not permitted to view footage without the specific agreement of the Federation's designated Data Protection Officer.

## 6. Monitoring Procedures

- 6.1 Camera surveillance will be maintained at all times. All images are stored for seven days before they are automatically deleted. If covert surveillance is planned, the decision to implement the surveillance will be made by the Data Protection Officer. All documentation must be retained and no covert surveillance will take place unless all necessary processes and authorisations have been obtained in advance. Covert surveillance will only be used for the purpose of detecting or preventing a crime.

## 7. Recording Procedures

- 7.1 In order to maintain and preserve the integrity of any digital copies used to record events from the system and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

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- Requests for recordings made by the police can only be actioned under Part 3 of GDPR.
  - If a request is made, the academy's CCTV Request form must be completed and the Headteacher informed of the request.

## 7.2 CCTV footage viewed by the police for the prevention and detection of crime

- Should footage be required as evidence, a copy may be released to the police with the agreement of the Data Protection Officer (on the delegated authority of the trust using a part 3 exemption form (formally a section 29)). An original recording CD Rom/DVD, identified by a unique mark and sealed in a plastic box or envelope, will be retained securely in the academy.
- Footage will only be released to the police on the clear understanding that the CD Rom/DVD remains the property of the Trust, and both the CD Rom/DVD and information contained on it are to be treated in accordance with this policy. The Trust also retains the right to refuse permission for the police to pass to any other person the CD Rom/DVD or any part of the information contained thereon. On occasions when a court requires the release of footage, this will be produced from a password-protected secure evidence folder.
- The police may require the academy to retain the stored CD Rom/DVDs for possible use as evidence in the future. Such CD Rom/DVDs will be correctly indexed and stored securely until they are required by the police.
- Applications received from outside agencies (e.g. solicitors) to view or release footage will be referred to the Data Protection Officer. In these circumstances, recordings may be released where satisfactory evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a court order. The identities of third parties should be obscured.
- A record will be maintained of all recordings released under this policy.

## **8. Breaches of the Code (Including Security)**

- 8.1 Any breach of the Code of Practice by academy users will be initially investigated by the Head of Human Resources, in order for them to take the appropriate action. Any serious breaches of the Code of Practice will be immediately investigated in accordance with the Trust's Staff Disciplinary Policy.
- 8.2 In the event that the member of staff in breach is the Headteacher, the Chief Executive Officer will be notified of all breaches; if the member of staff in breach

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is the Chief Executive, the Chair of the Priory Federation of Academies Trust will be notified of all breaches.

## **9. Complaints**

- 9.1 Any complaints about the Trust's CCTV system should be addressed to the Data Protection Officer. Complaints will be investigated in accordance with Breaches of the Code as above. Any third party complainant will be notified of the outcome of the investigation and if they are not satisfied with that outcome can refer the matter to the Office of the Information Commissioner.

## **10. Access by the Data Subject**

- 10.1 The Data Protection Act 2018 and the GDPR provides individuals to whom 'personal data' relate, with a right to data held about themselves, including those obtained by CCTV. Requests for Data Subject Access should be made in writing to [SAR@prioryacademies.co.uk](mailto:SAR@prioryacademies.co.uk). Any such requests for access to CCTV images should include:

- The date and time when the images were recorded;
- The location of the CCTV camera;
- Proof of identity of the individual.

## **11. Procedures**

- 11.1 This procedure may only be amended or withdrawn by The Priory Federation of Academies Trust.



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## **The Priory Federation of Academies Trust CCTV Policy**

This Policy has been approved by the Priory Federation of Academies Trust's Pay, Performance and HR Committee:

Signed..... Name..... Date:

Trustee

Signed..... Name..... Date:

Chief Executive Officer

Signed..... Name..... Date:

Designated Member of Staff

Please note that a signed copy of this agreement is available via Human Resources.