

GUILSBOROUGH ACADEMY

CCTV POLICY

Policy Name	CCTV
Committee	Finance Audit and Risk
Owner	Operations Manager
Statutory	No
Authorisation	Principal to ratify, FAR Trustees to note

Date Ratified	Review Date
April 2023	April 2024

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1. INTRODUCTION

- 1.1 The purpose of this Policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system at Guilsborough multi academy trust, hereafter referred to as 'the academy'.
- 1.2 The system comprises a number of fixed and dome cameras located in appropriate places around the academy site. All cameras are monitored by Authorised staff.
- 1.3 This policy follows Data Protection Act guidelines and our Records Retention Destruction and Archive Policy.
- 1.4 The policy will be subject to review periodically, but at least annually, to include consultation as appropriate with interested parties.
- 1.5 The CCTV system is owned by the academy.

2. OBJECTIVES OF THE CCTV SCHEME

- 2.1 To protect the academy buildings and their assets
- 2.2 To increase personal safety and reduce the fear of crime
- 2.3 To support the Police in a bid to deter and detect crime
- 2.4 To assist in identifying, apprehending and prosecuting offenders
- 2.5 To protect members of the public and private property
- 2.6 To assist in managing the academy

3. STATEMENT OF INTENT

- 3.1 The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 2018 and will seek to comply with the requirements both of the Data Protection Act and the Information Commissioner's Code of Practice.
- 3.2 The academy will treat the system and all information, documents and recordings obtained and used as data which is protected by the Act.
- 3.3 Cameras will be used to monitor activities within the academy and its car parks and other public areas to identify criminal activity occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the academy, together with its visitors.
- 3.4 Static cameras are not to focus on private homes, gardens and other areas of private property.
- 3.5 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the Police. Video will never be released to the media for purposes of entertainment.
- 3.6 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.
- 3.7 Data from CCTV 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.
- 3.8 Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at the main access routes to areas covered by the academy CCTV.

4. OPERATION OF THE SYSTEM

- 4.1 The system will be administered and managed by the Operations Manager, in accordance with the principles and objectives expressed in the policy.
- 4.2 The day-to-day management will be the responsibility of both the Senior Leadership Team and the Operations Manager during the day.
- 4.3 The CCTV system will be operated 24 hours each day, every day of the year.

5. MAIN CONTROL/SITE OFFICE

- 5.1 Authorised personnel will check the system in the course of their day-to-day duties.
- 5.2 Access to the CCTV facilities will be strictly limited to the, Operations Manager and authorised employees of Guilsborough Academy.

- 5.3 Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.
- 5.4 The system may generate a certain amount of interest. It is vital that facilities are managed with the minimum of disruption.
- 5.5 When not manned any office with a live connection to the CCTV system must be kept secured.
- 5.6 Technical support of the system and is maintained by outsourced security provider.

6. STAFF ACCESS/TRAINING

- 6.1 Guilsborough Academy staff that wish to have CCTV Access are to apply for access to Principal, Vice Principal or Operations Manager to sanction staff Access.
- 6.2 Training will be administered by the Operations Manager.
- 6.3 The Operations Manager will hold a log of Guilsborough Academy staff that have been given CCTV access.

7. LIAISON

- 7.1 Liaison meetings may be held with all bodies involved in the support of the system.
- 7.2 Storage and Retention of CCTV images
- 7.3 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.
- 7.4 All retained data will be stored securely.
- 7.5 Recordings are kept for no more than 30 days. Specific recordings which the school wishes to retain after this time will be logged.
- 7.6 An electronic file is held on a secure central server where specific CCTV image/recordings are retained. Access by staff to specific recordings are outlined below.
- 7.7 The Data Protection Act/GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Rather, retention should reflect the organisation's purposes for recording information, which should be informed by the purpose for which the information is collected, and how long it is needed to achieve this purpose. Storage availability is also a factor to be considered in the ability to retain recordings.

8. MONITORING PROCEDURES

- 8.1 Camera surveillance may be maintained at all times.
- 8.2 Pictures will be continuously recorded.

9. DISCLOSURE OF IMAGES TO THIRD PARTIES

- 9.1 The Academy will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.
- 9.2 Third parties acting behalf of a data subject will be handled in accordance with the Academy's Data Protection Policy.
- 9.3 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.
- 9.4 If a request is received form a law enforcement agency for disclosure of CCTV images then the Academy must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third-party images.
- 9.5 The information above must be recorded in relation to any disclosure.
- 9.6 If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

10. BREACHES OF THE POLICY (including breaches of security)

- 10.1 Any breach of the Code of Practice by academy staff will be initially investigated by the Principal/ Vice Principal/ Operations Manager, in order for him/her to take the appropriate disciplinary action.
- 10.2 Any serious breach of the policy will be immediately investigated, and an independent investigation carried out to make recommendations on how to remedy the breach.

- 11. ASSESSMENT OF THE SCHEME AND POLICY**
 - 11.1 Performance monitoring, including random operating checks, may be carried out by the Principal/Vice Principal /Operations Manager.

- 12. COMPLAINTS**
 - 12.1 Any complaints about the academy's CCTV system should be addressed to the Principal/Vice Principal.
 - 12.2 Complaints will be investigated in accordance with Section 9 of this policy.

- 13. ACCESS BY THE DATA SUBJECT**
 - 13.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data" relates) with a right to data held about themselves, including those obtained by CCTV.
 - 13.1.1 Where providing CCTV footage as part of a subject access request, this will only be done if the footage requested contains no other individual's data and where it does not infringe on another person's rights under the Data Protection Act (2018).
 - 13.2 Requests for Data Subject Access should be made in writing to the Principal/ Vice Principal. Subject access requests must be submitted in writing, either by letter or email to Mr Niland, Assistant Principal, niland@guilsborough.northants.sch.uk

- 14. PUBLIC INFORMATION**
 - 14.1 Copies of this policy will be available to the public from the Academy Office and the Principal.
 - 14.2 Summary of Key Points
 - 14.3 This policy will be reviewed every year.
 - 14.4 The CCTV system is owned and operated by the academy.
 - 14.5 The Control system is not open to visitors except by prior arrangement and good reason.
 - 14.6 Liaison meetings may be held with the Police and other bodies.
 - 14.7 Any recording data will be used properly, indexed, stored and destroyed after appropriate use.
 - 14.8 Recordings may only be viewed by Authorised Academy Officers and the Police.
 - 14.9 Recordings required as evidence will be properly recorded witnessed and packaged before copies are released to the Police.
 - 14.10 Recordings will not be made available to the media for commercial or entertainment purposes.
 - 14.11 Recordings will be disposed of securely.
 - 14.12 Any breaches of this policy will be investigated by the Principal. An independent Trustees investigation will be carried out for serious breaches.
 - 14.13 Breaches of the policy and remedies will be reported to the Principal/Vice Principal and relevant Trustee.



Viewing or Recording by Authorised Staff Form

Date of image viewed Time of image viewed.....

Name of person viewing the image

Location of incident

Reason for viewing

Outcome if any



Recording or Viewing by Third Party (e.g. police)

All data is the property of Guilborough Academy

Date Time of image viewed.....

Identification of third party

Name of academy staff present.....

Reason for allowing access request

Crime incident number (if applicable).....

Location of images.....

Name of person authorised to collect images (where appropriate)

Signature.....

Date of incident

Location of incident

Time of incident.....



Appendix A – Internal Storage

Log of stored CCTV images (specific footage stored for longer than standard period) Date Stored	Who by	Image/file Reference	Reason for retention	Please state the format these images are being stored (e.g. CD ROM/Hard Drive/Flash drive)	Please state the date the footage was erased , by whom and why.	Signed off by Data Protection Officer Date.

Appendix B – External Requests

Subject Access & Third Party Request Disclosure Log

NB: Please follow the Subject Access Request Policy procedures before disclosing any data Date request received and from whom (name & organisation)	Date referred to DPO	Subject Access Request or Third Party Request	State the reason (if third party)	Date & nature of disclosure (viewing or copy of image)	Images viewed/sent (state location, date,time of original image/s and internal image reference)	The outcome if applicable