CCTV Policy

Policy Owner:	Margo Muris	Approved By:	Finance & Resources Committee / Principal
Target Audience:	Parents, Carers, Pupils, and staff	Requirement to Publish on Website:	Yes
Purpose:	Policy sets out how we make use of CCTV whilst protecting the privacy of our pupils, parents, employees and other third parties.	Statutory Policy:	Yes
Approval Date:	December 2019	Latest Review date:	April 2022
Oversight by: Board Member/ Committee	Finance & Resources Committee	Next Review date	April 2024

CCTV POLICY

Introduction

The school recognises that CCTV systems can be privacy intrusive.

Review of this policy shall be repeated regularly, and whenever new equipment is introduced, a review will be conducted, and a risk assessment put in place. We aim to conduct reviews no later than every two years.

Objectives

The purpose of the CCTV system is to assist the Academy in reaching these objectives:

(a)   To protect pupils, staff and visitors against harm to their person and/or property.

(b)   To increase a sense of personal safety and reduce the fear of crime.

(c)   To protect the school buildings and assets.

(d)   To support the police in preventing and detecting crime.

(e)   To assist in identifying, apprehending, and prosecuting offenders.

(f)   To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence.

(g)   To assist in managing the school and promoting the safeguarding of pupils.

Purpose Of This Policy

The purpose of this Policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at the school. The CCTV system used by the school comprises of:

114 cameras, they all record motion, none of them can record sound and they are all fixed. A table listing the cameras with their location is below.

Camera (s)	Area
Internal Fixed Lens 4MP Dome Camera	Sports hall x2
Internal Fixed Lens 4MP Dome Camera	Small sports hall
Internal Fixed Lens 4MP Dome Camera x2	Bottom and top of ramp to sports hall
Internal Fixed Lens 4MP Dome Camera	Top of ramp, stairs
Internal Fixed Lens 4MP Dome Camera	Dance studio
INTERNAL 6MP PANORAMIC	Panoramic main reception
Internal Fixed Lens 4MP Dome Camera	Reception desk
Internal Fixed Lens 4MP Dome Camera	Reception doors
Internal Fixed Lens 4MP Dome Camera	Quad entrance
INTERNAL 6MP PANORAMIC Camera	Panoramic year 10
Internal Fixed Lens 4MP Dome Camera	Year 10 pod doors
Internal Fixed Lens 4MP Dome Camera	Year 10 playground exit
Internal Fixed Lens 4MP Dome Camera	Year 10 quad entrance
INTERNAL 6MP PANORAMIC	Panoramic year 9
Internal Fixed Lens 4MP Dome Camera	Year 9 pod doors
Internal Fixed Lens 4MP Dome Camera	Year 9 playground exit
Internal Fixed Lens 4MP Dome Camera	Year 9 fire exit

Camera (s)	Area
Internal Fixed Lens 4MP Dome Camera	Sandwich bar
INTERNAL 6MP PANORAMIC	Panoramic year 7
Internal Fixed Lens 4MP Dome Camera	Year 7 pod doors
Internal Fixed Lens 4MP Dome Camera	Year 7 playground exit
Internal Fixed Lens 4MP Dome Camera	Year 7 rear fire exit
Internal Fixed Lens 4MP Dome Camera	kitchen
Internal Fixed Lens 4MP Dome Camera	Kitchen seating area
Internal Fixed Lens 4MP Dome Camera	Kitchen seating area 2
INTERNAL 6MP PANORAMIC	Panoramic JC
Internal Fixed Lens 4MP Dome Camera	JC reception
INTERNAL 6MP PANORAMIC	Panoramic Primary
Internal Fixed Lens 4MP Dome Camera	Primary fire exit
Internal Fixed Lens 4MP Dome Camera	Primary main doors
Internal Fixed Lens 4MP Dome Camera x2	Primary pod corridor 1 and 2

Camera (s)	Area
Internal Fixed Lens 4MP Dome Camera	Primary upper stairs
Internal Fixed Lens 4MP Dome Camera x2	Year 7 pod 1st floor and upper stairs
Internal Fixed Lens 4MP Dome Camera x2	Year 9 pod 1st floor and upper stairs
Internal Fixed Lens 4MP Dome Camera x2	Year 10 pod 1st floor and upper stairs
Internal Fixed Lens 4MP Dome Camera	Year 11 pod upper corridor
Internal Fixed Lens 4MP Dome Camera	Reception upstairs
Internal Fixed Lens 4MP Dome Camera	Sixth form pod first floor
Internal Fixed Lens 4MP Dome Camera	Upper reception stairs
Internal Fixed Lens 4MP Dome Camera x2	6th form girls washroom and 6th form boys washroom (both restricted view)
Internal Fixed Lens 4MP Dome Camera x2	LRC library 6th form 1 and 2
Internal Fixed Lens 4MP Dome Camera x3	6th form post study 1 and 2 and 3
Internal Fixed Lens 4MP Dome Camera x2	Fitness1 and 2
Internal Fixed Lens 4MP Dome Camera	Helpdesk
Internal Fixed Lens 4MP Dome Camera	PE upper stairs
Internal Fixed Lens 4MP Dome Camera	Theatre

Camera (s)	Area
Internal Fixed Lens 4MP Dome Camera x2	Year 10,11 boys and girls washroom's (restricted view)
Internal Fixed Lens 4MP Dome Camera x2	Year 9 boys and girls washroom's (restricted view)
Internal Fixed Lens 4MP Dome Camera x2	Year7 & 8 boys and girls washroom's(restricted view)
External Fixed Lens 8MP Turret Camera	ARC main entrance
External Fixed Lens 8MP Turret Camera x2	ARC side 1 and side 2
Internal Fixed Lens 4MP Dome Camera	ARC reception inside
Internal Fixed Lens 4MP Dome Camera x2	ARC inside doors, and 2
Internal Fixed Lens 4MP Dome Camera x2	ARC middle 1, middle 2
Internal Fixed Lens 4MP Dome Camera	ARC rear inside
External Fixed Lens 8MP Turret Camera	ARC rear outside
External Fixed Lens 8MP Turret Camera x2	Compton Gate and Compton roundabout
External Fixed Lens 8MP Turret Camera	Primary Reception outside
External Fixed Lens 8MP Turret Camera	Primary playground
External Fixed Lens 8MP Turret Camera	Primary playground-ARC
External Fixed Lens 8MP Turret Camera	Primary yellow gate
External Fixed Lens 8MP Turret Camera x3	Year 7 pod, and 2, canopy
External Fixed Lens 8MP Turret Camera x2	Year 9 pod and 2

Camera (s)	Area
External Fixed Lens 8MP Turret Camera	Year 10 pod grass area
External Fixed Lens 8MP Turret Camera x2	Year 10 pod and 2
External Fixed Lens 8MP Turret Camera	Reception pod grass area
External Fixed Lens 8MP Turret Camera x2	Year 10 pod and 2
External Fixed Lens 8MP Turret Camera	Reception pod grass area
External Fixed Lens 8MP Turret Camera	Reception grass area driveway
	Reception entrance doors
External Fixed Lens 8MP Turret Camera	Astro
External Fixed Lens 8MP Turret Camera	Astro bike sheds
External Fixed Lens 8MP Turret Camera	Bengarth main gates
External Fixed Lens 8MP Turret Camera	Bengarth driveway
External Fixed Lens 8MP Turret Camera x2	Visitor / Sports hall car park
External Fixed Lens 8MP Turret Camera	Outside changing room fire exits and quad doors on the side of the building
Internal Fixed Lens 4MP Dome Camera x2	Quad seating area and Quad area doors
Internal Fixed Lens 4MP Dome Camera	Quad main entrance
Internal Fixed Lens 4MP Dome Camera	Quad ground floor lift
Internal Fixed Lens 4MP Dome Camera	Quad 1st floor building services

Camera (s)	Area
Internal Fixed Lens 4MP Dome Camera x2	Quad 1st floor zeppelin and 2
Internal Fixed Lens 4MP Dome Camera	Quad 1st floor seating area
External Fixed Lens 8MP Turret Camera	Minibuses
External Fixed Lens 8MP Turret Camera	John Chilton entrance
External Fixed Lens 8MP Turret Camera x2	Primary top car park and Primary car park ramp
External Fixed Lens 8MP Turret Camera	Compton gate house side and front
External Fixed Lens 8MP Turret Camera	Muga
External Fixed Lens 8MP Turret Camera	Front field lower

CCTV Cameras are not installed in areas in which individuals would have an expectation of privacy such as toilets and changing facilities. There are however, cameras in students' washrooms which have adjacent toilets, but these cameras have a restricted view and so do not to encroach on students' privacy. The cameras are also clearly signposted. There are no cameras in student changing facilities.

CCTV Cameras are installed in such a way that they are not hidden from view. Signs are predominantly displayed where relevant, so that staff, students, visitors and members of the public are made aware that they are entering an area covered by CCTV. The signs also contain contact details as well as a statement of purposes for which CCTV is used.

Statement Of Intent

The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.

The school will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

The system has been designed so far as possible to deny observation on adjacent private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

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 will be clearly visible on the site and make clear who is responsible for the equipment. These are placed at all gates and building entry points

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

CCTV images are not retained for longer than necessary, considering the purposes for which they are processed. Data storage is automatically overwritten by the system after a period of 30 days.

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. In the absence of compelling a need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 30 days.

System Management

Access to the CCTV system and data shall be password protected and will be kept in a secure area.

The CCTV system will be administered and managed by Paul Steedman, Security Team Leader who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager the system will be managed by IT Helpdesk Manager.

The system and the data collected will only be available to the Systems Manager, his replacement and members of staff designated by the Principal & CEO, specifically the leadership team, who will be able to view but not record footage, and staff who require access for their roles. Staff who have access for their roles, are Reception Staff who have access to cameras at the car park, gates and entrances, in order to permit visitors and members

of the Lettings Team who work out of normal school hours. Student Behaviour Staff also have access to cameras to manage student behaviour but cannot record images.

If a member of staff needs to view a CCTV footage then they need to email the Security Team, including the Team Leader, and request permission from a member of the leadership team.

The school police officer may request to view CCTV footage – this does not need to be followed up by an email from the leadership team.

One of the Security Team will email the requester when they have secured the footage and will save it on the SHARED DRIVE. It can only be accessed by members of staff designated by the Principal & CEO.

The CCTV system is designed to be in operation 24 hours each day, every day of the year, though the Academy does not guarantee that it will be working during these hours.

The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.

Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by proving clear, usable images.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

Where a person other than those mentioned above, requests access to the CCTV data or system, the System Manager must seek permission from the Principal and CEO who will satisfy him of the identity and legitimacy of purpose of any person making such request. Where any doubt exists access will be refused.

Details of all visits and visitors will be recorded in a system logbook including time/data of access and details of images viewed and the purpose for so doing.

Downloading Captured Data onto Other Media

To maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures:

- Each downloaded media must be identified by a unique reference.
- Before use, each downloaded media must be cleaned of any previous recording.
- the System Manager will register the date and time of downloaded media insertion, including its reference.

- Downloaded media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a downloaded media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.
- If downloaded media is archived the reference must be noted.
- If downloaded media is put onto a device, the device will be encrypted, and password protected.

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his replacement, the Principal & CEO, and other authorised senior leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable, if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the downloaded media (and any images contained thereon) remains the property of the school and downloaded media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the school to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until they are needed by the police.

Applications received from outside bodies (e.g. solicitors or parents) to view or release images will be referred to the school's Data Protection Officer and a decision made by the Principal in consultation with the Academy's data protection officer.

Complaints About The Use Of CCTV

Any complaints in relation to the school's CCTV system should be addressed to the Principal & CEO.

Request For Access By The Data Subject

The Data Protection Act provides Data Subjects – those whose image has been captured by the CCTV system and can be identified - with a right to access data held about themselves, including those obtained by CCTV. Requests for such data should be made to the Principal & CEO.

Public Information

Copies of this policy will be available to view on the Academy website.