



Learn@
MULTI ACADEMY TRUST



MULTI ACADEMY TRUST
St Matthias
ACADEMY

CCTV POLICY

**“ALL DIFFERENT,
ALL EQUAL,
ALL ACHIEVING TOGETHER”**

Author of template document	Andrea Wills		
Template approved by Trust Board	December 2017 subject to review by 31 March 2018 after consultation and promulgation across Learn@ MAT	Review	Annual
Last Updated	26 April 2018 A Wills GDPR references		
Status	Statutory for all Learn@ Academies to have individual CCTV Policies based on this template		
St Matthias Academy	Draft for Academy Council Approval November 2018	Review	September 2019

Sources

Information Commissioner

<https://ico.org.uk/>

<https://ico.org.uk/for-organisations/education/education-gdpr-faqs/>

Information commissioner's Code of Practice

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

Surveillance Commissioner

<https://www.gov.uk/government/organisations/office-of-surveillance-commissioners>

General Data Protection Regulation (GDPR)

<https://www.eugdpr.org/gdpr-faqs.html>

Data Protection Act 1998 to be superseded by Data Protection Act 2018

<https://www.legislation.gov.uk/ukpga/1998/29/contents>

Covert Monitoring

[https://ico.org.uk/media/for-](https://ico.org.uk/media/for-organisations/documents/1064/the_employment_practices_code.pdf)

[organisations/documents/1064/the_employment_practices_code.pdf](https://ico.org.uk/media/for-organisations/documents/1064/the_employment_practices_code.pdf)

DRAFT

1. Introduction

- 1.1 The purpose of this Policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at St Matthias Academy, hereafter referred to as 'the Academy'.
- 1.2 The CCTV systems comprise of 42 Fixed and Dome cameras at the Fishponds site and 23 Fixed and Dome cameras at the Brentry site. The systems does not have sound recording capability. A list of all the cameras is at appendix A. A location plan for all the cameras is at appendix B.
- 1.3 All CCTV cameras are monitored from the Head teacher's office and recorded images and information are only available to selected authorised persons detailed in this policy and summarised at appendix C.
- 1.4 The Academy's CCTV system is registered with the Information Commissioner under the terms of the General Data Protection Regulation (GDPR). The use of CCTV and the associated recorded footage are covered by the GDPR.
- 1.5 The Academy's CCTV Policy will be subject to annual review to include consultation with interested parties when appropriate.
- 1.6 Hard copies of this policy are available from the Academy office.

1. Objectives of the CCTV System

- 2.1 To protect pupils, staff and visitors.
- 2.2 To increase personal safety and offer a secure environment.
- 2.3 To protect the Academy buildings and assets.
- 2.4 Without prejudice, to protect the personal property of pupils, staff and visitors.
- 2.5 To support the Police in preventing and detecting crime.
- 2.6 To assist in identifying, apprehending and prosecuting offenders.
- 2.7 To assist in managing the school.

2. Statement of Intent

- 2.1 The Academy will seek to comply with the requirements of the GDPR and the Information Commissioner's Code of Practice to ensure that the CCTV system is responsibly used on its premises and that trust and confidence in its continued use is safeguarded.
- 2.2 The Academy will treat the CCTV system, all recordings, information and documents (to include those originally gathered and those subsequently used) as data protected under the GDPR.
- 2.3 The Academy will use CCTV cameras to monitor activities within its buildings and grounds to identify criminal activity actually occurring, anticipated or perceived. It will be used for the purpose of securing the safety and wellbeing of its pupils, staff and visitors, and to prevent loss or damage to Academy property.
- 2.4 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 with the written authority of the Police. Recordings will never be released to the media for purposes of entertainment.
- 2.5 The original planning, design and installation of our CCTV system has tried to ensure that it will give the maximum effectiveness and efficiency but it is not possible to

guarantee that it will cover or detect every single incident taking place in the areas of coverage.

2.6 CCTV warning signs, as required by the Information Commissioner's Code of Practice, will be clearly visible and prominently placed on the site. Signs will contain details of the purpose for using CCTV (see appendix E). In areas where it is used, the Academy will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

3. System Management

- 3.1 The CCTV system is administered and managed by the Academy in accordance with the principles and objectives set out in this policy.
- 3.2 The day-to-day management of the CCTV system is the responsibility of the Head teacher and Site Manager.
- 3.3 The CCTV is monitored centrally from The Head teacher's office. The visitor's entrance is monitored from the main office. Access to images is password protected and is controlled by Aileen Morrison, or in her absence by Simon Quinn who are the System Managers.
- 3.4 The CCTV system will operate 24 hours each day, every day of the year.
- 3.5 The Academy's System Manager will check the CCTV system weekly during term time and at regular intervals during the holidays to ensure the cameras are working properly and the equipment is recording effectively.
- 3.6 Unless an immediate response to events is required, CCTV cameras will not be directed at an individual, their property, or a specific group of individuals, without authorisation in accordance with the Investigatory Powers Act.
- 3.7 Access to CCTV footage will be restricted to those staff authorised to view it and will not be made more widely available unless requested by lawful process, such as the Police or Court of Law (see paragraph 8 Disclosure of CCTV footage to third parties). The Academy Council determines this authorisation. (Authorised persons are named in Appendix C) Authorised persons will be trained for their role and updated on a regular basis.
- 3.8 The Headteacher must satisfy himself of the identity of anyone wishing to view recordings or access the CCTV system and the legitimacy of the request. Where any doubt exists access will be refused.
- 3.9 The Academy will document in a CCTV system log book the details of ALL visits and visitors relating to the viewing of recordings or access to the CCTV system, including the time and date of access and details of the footage viewed.
- 3.9 Any access visit, previously authorised by the Headteacher, may be immediately curtailed, if prevailing operational requirements make this necessary.

4. Consultation

The introduction of, or significant changes to, the CCTV system at the Academy will be subject to a Data Protection Impact Assessment (DPIA) and consultation with staff, members of the school community and the Academy Council, who will inform the Learn@ Trust Board of the outcome.

5. Siting the Cameras

- 5.1 Cameras will be sited so 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 Academy will ensure that the location of equipment is carefully considered to ensure that images captured comply with the GDPR.
- 5.2 The Academy will make every effort to position cameras so that their coverage is restricted to the premises, which may include outdoor areas.
- 5.3 CCTV will be used in classrooms and within areas that have been identified by staff and pupils as not being easily monitored at all times.
- 5.4 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

6. Covert Monitoring

- 6.1 It is not the Academy's policy to conduct covert monitoring and it will be rare for its use to be justified in the Academy. Covert monitoring means monitoring carried out in a manner calculated to ensure individuals subject to it are unaware that it is taking place. For covert monitoring to be justified senior management must be satisfied that there are sufficient grounds for suspecting:
 - i) criminal activity or equivalent malpractice is taking place and that
 - ii) notifying individuals about the monitoring would seriously prejudice its prevention or detection.
- 6.2 The Academy will not undertake covert monitoring unless senior management has granted authorisation. The Headteacher should normally obtain such authorisation from the Learn@ MAT CEO and the CEO should normally inform the Academy Council and the Trust Board before any covert monitoring begins.
- 6.3 Covert monitoring must be strictly targeted at obtaining evidence within a set time frame and as part of a specific investigation. It will not continue after an investigation is complete.
- 6.4 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 and changing areas.
- 6.5 The Academy will limit the number of people involved in a covert monitoring investigation and will set up clear rules limiting the disclosure and access to information obtained before it begins.

- 6.6 Any information obtained by the Academy through covert monitoring will only be used for the prevention or detection of criminal activity or equivalent malpractice. Other information collected in the course of monitoring will be disregarded and, where feasible, deleted, unless it reveals information that the Academy could not reasonably be expected to ignore.

7. Storage and Retention of CCTV Footage

- 7.1 The Academy will retain its CCTV footage for 40 working days after it was recorded to allow sufficient time for video to be retrieved in the event of an incident or complaint, whilst respecting the advice of the Information Commissioner that data should not be retained for longer than necessary.
- 7.2 While retained, the integrity of the CCTV footage will be maintained to ensure its evidential value and to protect the rights of the people whose images have been recorded.
- 7.3 All retained data will be securely stored and permanently deleted as appropriate/required.

8. Access to CCTV Footage

- 8.1 In order to maintain and preserve the integrity of the data recorded by the Academy's CCTV system and to ensure its admissibility as evidence in any legal proceedings, any download media used to record events from the system's hard drive must be prepared in accordance with the following procedures:
- Each download media must be identified in a unique way.
 - Before use, any previous recording(s) must be erased from the download media.
 - The System Manager will log the date and time of download media insertion including its unique reference.
 - Download 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 download 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 secure evidence store.
 - If download media is archived it must be logged in detail to allow it to be easily retrieved and it must be securely stored.

9. Subject Access Requests (SAR)

- 9.1 Individuals have the right to request access to CCTV footage relating to themselves under the General Data Protection Regulation.
- 9.2 All requests must be made in writing to the Headteacher of the Academy. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, the date, time and location where it was recorded.
- 9.3 The Academy will respond to requests within one calendar month of receiving a written SAR. This is in line with the GDPR.

9.4 The Academy reserves the right to refuse access to CCTV footage where the requested data falls under one of the following exemptions:

- Crime prevention and detection
- Negotiations with the requester
- Information used for research, historical or statistical purposes
- Information covered by legal professional privilege

10. Access to and Disclosure of CCTV Footage to Third Parties

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

10.2 Requests for CCTV footage from third parties must be made in writing to Learn@ MAT's CEO, who may take legal advice and would refer the request to both the Academy Council and the Trust Board.

10.3 The Academy will keep a written record of the release of any download media to the Police or other authorised applications.

10.4 If CCTV footage is required as evidence, a copy of it may be given to the Police under the procedures described in this policy. Footage will only be released to the Police on the clear understanding that the download media and any footage contained on it, remains the property of the Academy and download media and any footage contained on it must be treated in accordance with the General Data Protection Regulation. The Academy also retains the right to refuse permission for the Police to pass the downloaded media and any footage contained on it 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.

10.5 The data may be used within Learn@ MAT discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

11. Assessment of the System and Code of Practice

Performance monitoring, including random operating checks, may be carried out by a Member or Trustee of Learn@ MAT's Trust Board, the CEO or Headteacher.

12. Complaints

Any complaints about the operation of the Academy's CCTV system should be made to the Headteacher. Complaints will be dealt with in accordance with Learn@ MAT's Complaints Policy.

13. Summary of Key Points

13.1 This policy will be reviewed annually.

13.2 The CCTV system is owned and operated by St Matthias Academy.

13.3 The CCTV system and recordings are not available to third parties, including the Police, except under the procedures detailed in this policy.

- 13.4 Downloaded media will be used properly, indexed, stored and destroyed after appropriate use, in accordance with the Data Protection Act.
- 13.5 Downloaded media required as evidence will be properly documented, witnessed and packaged before copies are released to the police.
- 13.6 Downloaded media will not be made available to the media for commercial or entertainment purposes.

DRAFT

Appendix A

List of CCTV Cameras comprising 'the system' at St Matthias Academy

In the Interests of Site Security, the location of the CCTV cameras is not being published on the Internet.

Appendix B

In the Interests of Site Security, the location of the CCTV cameras is not being published on the Internet.

Appendix C

Authorised Persons

The Academy Council for St Matthias Academy authorise the following people (roles) to have access to the CCTV footage in line with the procedures detailed in this CCTV Policy.

Head Teacher
Site Manager
Designated Safeguarding Lead (DSL)
Deputy/Assistant Head Teachers
Behaviour Support Team (Section 2.3)

Appendix D

Checklist

The Headteacher for this Academy site controls its CCTV system and the images produced by it. The Headteacher is responsible for how the CCTV system is used and for notifying the Information Commissioner about it, including any modifications of use and/or its purpose (which is a legal requirement of the General Data Protection Regulation 2018).

Learn@ MAT 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 the Academy's community. It will not be used for other purposes. Each of its Academies will conduct an annual review of its use of CCTV.

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			
There is a named individual who is responsible for the operation of the system.			
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.			
Staff and members of the Academy community will be consulted about any proposal to install or amend a CCTV System.			
Cameras have been sited so that they provide clear images.			
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.			
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).			

	Checked (Date)	By	Date of next review
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.			
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 or a complaint to be made.			
Except for law enforcement bodies, CCTV footage will not be provided to third parties.			
Authorised people in the Academy know how to respond to individuals making requests for copies of their own images. If unsure they know to seek advice from the CEO, Learn@ MAT's lawyers or from the Information Commissioner as soon as such a request is made.			
Regular checks are carried out to ensure that the CCTV system is working properly and produces high quality images.			

Appendix E

CCTV Signage

It is a requirement of the GDPR to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The Academy will 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 Academy
- The contact telephone number or address for enquiries



Example sign