

# Aletheia Anglican Academies Trust



## CCTV Policy

<b>Review Body:</b>	<b>Board of Trustees</b>
<b>Leadership Grp Responsibility:</b>	<b>Chief Finance Officer</b>
<b>Policy Type:</b>	<b>Statutory (as part of Data Protection Policy)</b>
<b>Adopted:</b>	<b>November 2017</b>
<b>Date of next review:</b>	<b>November 2019</b>
<b>Review period:</b>	<b>2 years</b>

This procedure was adopted by the Board of Trustees of Aletheia Anglican Academies Trust, for implementation in all Trust academies on the date above and supersedes any previous CCTV Policy.

## **Introduction**

The Aletheia Anglican Academies Trust uses closed circuit television (CCTV) images to reduce crime and monitor its school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent loss or damage to academy property.

CCTV systems are operated and monitored by the Premises Team and the ICT Technical Services Team.

## **Data Protection**

The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 1998.

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

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

It is a requirement of the Data Protection Act 1998 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school will ensure that this requirement is fulfilled.

## **Siting the Cameras**

Cameras are 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. Each Academy will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

Cameras are positioned so that their coverage is restricted to the academy premises, which may include outdoor areas.

Members of staff have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

Signs are placed so that students, staff and the public are aware that they are entering a zone which is covered by surveillance equipment.

The purpose of the use of CCTV is displayed – e.g. "CCTV in operation for your safety and security"

## **Storage and Retention of CCTV images**

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. Recordings are retained for 14 days unless required for evidential value.

All retained data is stored securely at the academy, and access to recorded images is restricted to those staff authorised to view them, and will not be made more widely available.

A documented procedure should be kept by the Network Manager/Senior ICT Technician which ensures that the accuracy of the system features is checked and if necessary amended or altered.

The Network Manager/Senior ICT Technician is responsible for ensuring the following checks are carried out

To be done daily

- Check all footage is playable
- Check that the cameras and equipment are working properly
- Check that video can be retrieved
- Ensure any special features are accurate (e.g. time display)
- Report immediately if equipment is faulty or damaged via email to Line Manager

Check that any saved footage is not older than 14 days. If it is it needs to be deleted off of the system.

## **Subject Access Requests (SAR)**

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

All requests should be made in writing to the Headteacher. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified, for example, date, time and location.

The academy will respond to requests within 40 calendar days of receiving the written request and fee.

A fee of £10 will charged per request.

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

## 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 academy where these would reasonably need access to the data (e.g. investigators).

Requests should be made in writing to the Headteacher.

The data may be used within the academy's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

Approved list of staff that has access to CCTV footage is included below, this is a stacked system on level to ensure the correct person deals with an issue raised.

It is required that appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of data and against accidental loss, damage or destruction.

The nature of the data to be processed should be considered and where it contains details of inappropriate/unnecessary material it must be processed with greater care.

## Complaints

Complaints and enquiries about the operation of CCTV within the academy should be directed to the Headteacher.

### STAFF ACCESS RIGHTS

Level	Name	Access
1	IT Team Members	Full Access & Operational Use
2	Leadership Team Members	Full Access
3	Year Managers / Pastoral Team	Viewing of CCTV footage
3	Finance Manager	Viewing of CCTV footage
4	Welfare Team including the Nurse	Viewing of CCTV footage
5	All other staff members	Viewing of CCTV footage, provided authorised by Level 2 or 3 above