



CCTV Policy for The Ferns Academy ("the Academy")

Policy Document Control Sheet: Trust lead: Ian Hickman Key Staff lead for The Ferns Academy: Alison Dale Portfolio Governor lead: Paul Cheers Status: agreed and adopted		
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1. Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system at the Academy. The system comprises a number of fixed and dome cameras located around the Academy site. All cameras are monitored from a Central Control Room and are only available to selected authorised staff. This Policy follows Data Protection Act guidelines and will be subject to review. The CCTV system is owned by the Academy.

2. Objectives of the CCTV scheme

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

3. Statement of intent

- The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and the Information Commissioner's Code of Practice.
- The Academy will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.
- Cameras will be used to monitor activities within the Academy and its car parks and other public areas (such as entrances and adjacent highway) to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the Academy, together with its visitors. Cameras may be visible or concealed.
- Static cameras are not to focus on 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. Data will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Data will never be released to the media for purposes of entertainment.

- The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency, within financial constraints, 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 all access routes to areas covered by the Academy CCTV.

4. Operation of the system

- The system will be administered and managed by the Principal or their delegated representative, in accordance with the principles and objectives expressed in the code.
- The day-to-day management will be the responsibility of both the Principal, Business Manager and Site Manager.
- The data storage PCs & monitors will be in a locked room at all times (Main Office).
- The CCTV system will be operated 24 hours each day, every day of the year.

5. Signage

Signs will be positioned at all school entrances where CCTV operates. These signs will indicate that CCTV monitoring and recording are in use on the premises.

6. Recording of CCTV images

Recordings may be made from any CCTV cameras. These recordings will include the date, time and system information overlay. Recording equipment will be housed in locked offices to which only authorised staff have access. Recordings will be kept for 31 days, unless required as part of an ongoing investigation, in which case recordings will be retained for as long as required for that investigation. The security of the stored data will be password controlled. Access to this storage is restricted to the Principal or his/her nominated representatives. At the end of approximately 31 days the recordings will be erased by overwriting them with new recordings.

7. Viewing of live CCTV images

Display equipment used to view the images from CCTV cameras will be located and positioned in such a way as only those responsible for security may ordinarily see the screen.

8. Viewing of recorded CCTV images

Recorded images may be viewed on a 'need to view basis' - only those who need to see the image for security, school management, crime prevention and detection or health and safety purposes may do so.

All viewings of recorded images must be authorised by the Principal or their delegated representative. Reasons for wishing to view must be logged alongside details of times, dates and signatures of the viewer and authorisation officer.

Data copied to disc (or other medium) must be authorised by the Business or Operations Manager, Vice Principal or the Principal. Reasons for wishing to copy data must be logged alongside details of times, dates and signatures of the person taking the data and authorisation officer. Copies of recorded data must only be taken off-site by the police. Any other copies of recorded data must be kept in a secure location, on site, and destroyed as soon as no longer required. When destroyed a signature will appear beside the original entry.

9. CCTV for security and protection of property

Locating CCTV cameras in academy grounds is normally justified if it ensures the safety of pupils and others and protects academy property. However, alternative solutions, such as improved lighting, should normally be considered first.

10. CCTV for monitoring movement and behaviour of pupils and staff

CCTV for monitoring the movement and behaviour of pupils and staff may be used in justifiable circumstances. Only in exceptional circumstances will a camera be placed where privacy is expected, for instance a toilet or changing room. In any event, it will not be used for recording conversations.

The Information Commissioner's Office (ICO) considers this highly intrusive and unlikely to be justified.

Before installing CCTV for these purposes, the Academy will:

- carefully assess all alternative solutions – if the purpose is for managing pupil behaviour, for example preventing bullying.
- carry out a privacy impact assessment to assess how this will affect the right to privacy of pupils and staff.
- consult pupils, parents and staff and where possible get their consent to install cameras. If consent cannot be obtained, then pupils, parents and staff should be fully informed that CCTV is installed as failure to do so is likely to breach the Human Rights Act and the Data Protection Act.

11. CCTV in classrooms

The Academy may wish to use CCTV or other surveillance technologies for:

- performance management or reflective practice of staff;
- managing pupils' behaviour in classrooms.

In both cases, alternative solutions will be considered first and the Academy will only install the technology only with the agreement of pupils, parents and staff, and if no other solutions are possible.

Informed consent, particularly with regard to performance management or reflective practice of staff will be obtained.

12. CCTV in toilets and changing rooms

CCTV and other surveillance technologies will not be used in areas where individuals have a heightened expectation of privacy.

It is the view of the ICO is that cameras may be used in toilets, changing rooms and similar areas in exceptional circumstances. It is unlikely that the Academy would be able to demonstrate circumstances that warrant the use of CCTV in these situations. However, we reserve the right to do so in exceptional circumstances.

13. Data Protection Act

Individuals have the right to request access to CCTV footage relating to them under the Data Protection Act. Requests must be directed to the Trust's Data Protection Officer (see Data Protection Act: Requesting Access to Personal Data for further information. Individuals) submitting requests for access will be asked to provide sufficient information to enable the footage relating to

them to be identified. The Academy reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

14 General Data Protection Regulations

The EU General Data Protection Regulation (GDPR) is now law and becomes enforceable from May 2018, when certain aspects of legislation will change significantly.

The EU GDPR will be adopted by the UK irrespective of BREXIT, the stated date for implementation is Friday 25th May 2018 when it becomes enforceable.

The Information Commissioner's Office has revealed it will be publishing GDPR compliance guidance in stages over the intervening period – rather than as a single document – with each piece of guidance addressing a specific topic.

The Trusts Data Protection Officer will monitor ICO guidance and disseminate these to academies as appropriate.

15. System maintenance

Display equipment and recordings may be viewed by personnel authorised to undertake installation and maintenance of the CCTV systems. Such viewing will be restricted to that necessary for system work.

16. Police co-operation

The Academy wishes to maintain good working relations with the police and will co-operate whenever it can do so within the law.

17. Complaints

Any complaints about the Academy's CCTV system should be addressed via the Trusts Complaints Procedure.

18. Relevant Policies

- Information Security and Assurance Policy
- Data Protection Policy
- Data Security Breach Policy
- Publication Scheme
- Records Management Policy
- Archiving Policy
- Privacy Impacts Assessment Statement
- Complaints Procedure

19. Relevant legislation

- Data Protection Act 1998
- General Data Protection Regulations 2018 (effective from 25th May 2018)

20. Relevant Links

Information Commissioner – www.ico.org.uk

