



# CCTV Policy

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## **1 Introduction**

- 1.1 Trevithick Learning Academy uses closed circuit television (CCTV) images to monitor the academy buildings in order to provide a safe and secure environment for pupils, staff and visitors, to reduce crime and to prevent loss or damage to academy property.
- 1.2 The system comprises a number of fixed cameras.
- 1.3 The system sound recording capability is turned off.
- 1.4 The CCTV system is owned and operated by the academy, the deployment of which is determined by the academy's leadership team.
- 1.5 The CCTV is monitored and reviewed from the server room adjacent to the ICT office and Site Supervisors office.
- 1.6 The introduction of, or changes to CCTV monitoring will be subject to consultation with staff and the academy community.
- 1.7 The academy's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018 (GDPR). The use of CCTV, and the associated images and any sound recordings is covered by the Data Protection Act 2018. This policy outlines the academy's use of CCTV and how it complies with the Act.
- 1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are trained by the academy data controller in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

## **2 Statement of Intent**

- 2.1 The academy complies 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/1542/cctv-code-of-practice.pdf>
- 2.2 CCTV warning signs will be clearly and prominently placed at all external entrances to the academy, including academy gates if coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV (see appendix B). In areas where CCTV 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.

- 2.3 The planning and design has endeavoured to ensure that the Scheme 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 Siting the Cameras**

- 3.1 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 Data Protection Regulations.
- 3.2 The academy will make every effort to position cameras so that their coverage is restricted to the academy premises, which may include outdoor areas.
- 3.3 CCTV will not be used in classrooms but in areas within the academy that have been identified as not being easily monitored.
- 3.4 Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

### **4 Covert Monitoring**

- 4.1 The academy may in exceptional circumstances set up covert monitoring, for example:
- i) Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
  - ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- 4.2 In these circumstances authorisation must be obtained from a member of the senior leadership team.
- 4.3 Covert monitoring must cease following completion of an investigation.
- 4.4 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.

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

- 5.1 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.
- 5.2 All retained data will be stored securely.

## **6 Access to CCTV images**

- 6.1 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

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

- 7.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act 2018.
- 7.2 All requests should be made in writing to the Head of School. 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.
- 7.3 The academy will respond to requests within 40 calendar days of receiving the written request and fee.
- 7.4 Under GDPR legislation a fee is not normally charged, although a reasonable fee based on the administrative cost of providing the data can be charged when a request is manifestly unfounded or excessive, particularly if it is repetitive.
- 7.5 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.

## **8 Access to and Disclosure of Images to Third Parties**

- 8.1 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).
- 8.2 Requests should be made in writing to the Head of School.
- 8.3 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.

## **9 Complaints**

- 9.1 Complaints and enquiries about the operation of CCTV within the academy should be directed to the Head of School in the first instance.

## **10 Further Information**

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition V1.2 2017 (published by the Information Commissioners Office) [www.ico.gov.uk](http://www.ico.gov.uk)
- Surveillance Cameras Commissioner  
[www.gov.uk/surveillance-camera-commissioner](http://www.gov.uk/surveillance-camera-commissioner)
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018
- General Data Protection Regulation (GDPR) 2018

## Appendix A - Checklist

This CCTV system and the images produced by it are controlled by Venture Multi Academy Trust (the data controller) who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose.

Trevithick Learning Academy has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of staff, pupils and visitors. It will not be used for other purposes. We conduct an annual review of our 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 the proposal to install or amend CCTV equipment.			
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).			
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.			
Except for law enforcement bodies, images will not be provided to third parties.			
The organisation knows how to respond to individuals making Subject Access Requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.			
Regular checks are carried out to ensure that the system is working properly and produces high quality images.			

## **Appendix B – CCTV Signage**

It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The academy is to 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



## Appendix C

The CCTV Network Video Recorders (NVR) are located in network cabinets.

- Server room
- Reflection room (store).

At the moment there are 16 cameras which are a mixture of older analogue and HD cameras as follows:

- Internal (Entrance/Reception)
- 15 External locations

The system is at capacity, but there is a imminent planned install of an additional 8 HD cameras along with an 8 port NVR to cover the new ARB unit which will be located as follows:

- Internal (Entrance/Reception)
- 7 External locations

At the moment, there is a monitor and control mouse in the server room.

Simple live viewing of all/individual main school (not ARB unit) cameras etc. is possible by all.

ARB unit cameras will be viewable remotely by specific computers as is also the case with main school cameras.

Agreed system users will receive a copy of the CCTV policy and training – they must sign to agree to the policy.

The system requires a login to use advanced functions, such as viewing stored recordings or changing settings.

The following named users have access to the admin code to the CCTV system.

The principle of least access should be followed.

The CCTV system was installed and is maintained by Duchy Alarms.

### **CCTV User List**

Head of School	Will Johnson
Executive Principal	Sean Powers
DSL	Chris Sevier
Site Supervisor	Ian Webster
Business Manager	Jo Long
Office Manager	Lorraine McAusand
ICT Manager	Dan Harvey