

# SAINT JOHN HOUGHTON CATHOLIC VOLUNTARY ACADEMY

## CLOSED CIRCUIT TELEVISION (CCTV) POLICY

Date Adopted: September 2015

Reviewed: December 2016 by Headteacher

Date of Next Review: December 2017

### Introduction

**The purpose of this document is to regulate the management, operation and use of CCTV systems in our academy.**

- 1 The Academy's CCTV scheme is registered (Registration Number: PZ3097488) with the Information Commissioner under the terms of the Data Protection Act 1998. The Data Controller is Saint John Houghton Catholic Voluntary Academy.
- 2 The Academy uses CCTV for the monitoring and collection of sound and/or visual images for the purpose of maintaining the security of the premises, for preventing and investigating crime and for safeguarding students and staff. The Academy does not use CCTV for covert monitoring.
- 3 The data subjects are: students, staff, customers, clients, members of the public, offenders and suspected offenders and those inside, entering or in the immediate vicinity of the area under surveillance.
- 4 The CCTV system comprises fixed internal and external cameras owned and operated by the Academy and location and deployment of the equipment is determined by the Academy Leadership Team.
- 5 The CCTV is monitored by staff authorised by the Headteacher.
- 6 The Academy has carried out a CCTV Impact Assessment which will be reviewed annually.
- 7 The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and the Academy community.
- 8 All authorised operators and employees approved to access images are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators receive training relating to the requirements of this document, the Academy safeguarding policies and procedures, e-safety and Data Protection. All operators and employees are aware that failure to adhere to these requirements may result in disciplinary action.

## Statement of Intent

- 9 The Academy complies with the Information Commissioner's Office (ICO) CCTV Code of Practice "In the Picture: A data protection code of practice for surveillance cameras and personal information" and further details are available at <http://www.ico.gov.uk>
- 10 CCTV warning signs will be clearly and prominently placed at all external entrances to the Academy. In areas where CCTV is used indoors then prominent signs sized appropriately will be placed at both the entrance of the CCTV zone and within the controlled area. Signs will contain details of the purpose for using CCTV and where appropriate the name and address of the Academy.
- 11 The planning and design of the system has been carried out to minimise any invasion of privacy and ensure that the scheme will give maximum effectiveness and efficiency. However it is recognised that the system is not guaranteed to detect every incident taking place in the areas of coverage.

## Siting the Cameras

- 12 Cameras are located in those areas where the Academy has identified a need and where other solutions are ineffective or impractical.
- 13 Cameras will be sited so as to capture images and/or sound relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated in line with the Data Protection Act. Cameras will be checked regularly to ensure they have not been moved or tampered with in any way.
- 14 Cameras will be positioned so that their coverage is restricted to Academy premises although it is recognised that cameras sited at the front of the premises may also cover properties directly opposite the main entrance to the Academy.

## Storage and Retention of CCTV Images and Recordings

- 15 Recorded data will not be retained for longer than necessary and will be deleted appropriately in line with approved procedures. While retained the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the individuals whose images have been recorded.
- 16 All retained data will be stored securely and access limited to authorised operators and employees only.

## Access to CCTV Images and Recordings

- 17 Access to live images is restricted to the CCTV operator unless the monitor displays a scene which is in plain sight from the monitored location.
- 18 Access to CCTV images and recordings will be restricted to those staff authorised to view them, and will not be made more widely available. A list of staff authorised to view images from this CCTV system will be held by the Academy in the HR Office.

## Subject Access Requests

- 19 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act. All requests must be made in writing to the Headteacher providing sufficient information to enable the footage relating to them to be identified and isolated, for example, date, time, location. The Academy will respond to requests within 40 calendar days of receiving the written request and a fee of £10 per request will be made. The Academy reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

## Access to and Disclosure of Images and Recordings to Third Parties

- 20 There will be no disclosure of recorded data to third parties other than in the following circumstances. Disclosure of the recorded images to third parties can only be authorised by the data controller. Disclosure will only be granted:
  - if its release is fair to the individuals concerned
  - if there is an overriding legal obligation (eg information access rights)
  - if it is consistent with the purpose for which the system was established

All requests for access or for disclosure are recorded. If access or disclosure is denied, the reason is documented.

Disclosure may be authorised to law enforcement agencies, even if a system was not established to prevent or detect crime, if withholding it would prejudice the prevention or detection of crime.

- 21 The data may be used within the Academy's discipline and grievance procedures for staff as required and as part of the Behaviour Management strategies for students and will be subject to the usual confidentiality requirements of those procedures.

## **Enquiries and Complaints**

- 22 Enquiries and complaints about the operation of CCTV at the Academy should be directed to the Headteacher in the first instance.
- 23 Failure of operators or staff to comply with the requirements of this policy may lead to disciplinary action.

## **Monitoring and Evaluation**

- 24 The Academy undertakes regular audits to ensure that the use of CCTV continues to be justified. The audit includes a review of:
  - its stated purpose
  - the location
  - the images recorded
  - storage length
  - deletion
- 25 This policy will be reviewed annually by the Headteacher. If the Academy decides to change the way in which it uses CCTV, it will inform the Information Commissioner within 28 days.