CCTV POLICY

Policy:	CCTV Policy
Reviewers:	Exec Group/Full Governing Body
Approved by:	Local Governing Body
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Review cycle:	2 Years

VERSION CONTROL		
DATE	AUTHOR	CHANGES
June 2021	David Jackson	1.1, 1.2, 1.3, 1.4 replaced with new content. Section 2 new content. 1.5.4 and sections 1.6, 1.7 and 1.8 removed/replaced with new content in sections 5, 6 and 7. 1.5 Data Controller information updated. Section 1.9 updated with new content in section 8. Sections 1.10, 1.11, 1.12 and 2 removed. Section 3 updated and now Section 9. Section 4 updated and now Section 10. Reference to new system included and updates to persons responsible throughout policy. Numbering reformatted.
August 2023	Donna Barnes	Page 3 - Academy vision statement added. Network Manager replaced with IT Support Team. Titles updated in appendix.

Our vision is to create a distinctively Christian and values driven environment that provides the best start to the 70 or more great years our students should enjoy when they leave our school. Our students should have the opportunity to live life in all its fullness and be good citizens wherever they may be.

1   Introduction

1.1   At the Samworth Church Academy, we take our responsibility towards the safety of staff, visitors and students very seriously. We expect all people to behave responsibly and safely but use surveillance cameras (CCTV) to monitor any instances of aggression or physical damage to our site and our people. Our CCTV system mainly uses a networked based system, with an older hard disk drive system still in use in some areas.

1.2   The purpose of this policy is to manage and regulate the use of the CCTV systems at the Academy and ensure that:

- We comply with relevant legislation.
- The systems are suitable for the purposes we require them for.

1.3   This policy covers the use of CCTV systems which capture moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes:

- Observing what an individual is doing;
- Taking action to prevent a crime;
- Using images of individuals that could affect their privacy;
- To provide a safe and secure environment for students, staff and visitors and to assist in the investigation of accidents, incidents and near misses.

1.4   The management, operation and maintenance of the networked CCTV at the Academy is vested with the IT Support Team and the hard disk CCTV system with the Site Manager.

1.5   The Diocese of Southwell and Nottingham Multi Academy Trust (SNMAT) is the corporate body registered with the Information Commissioners' Office as a Data Controller.

2   Purpose and justification

2.1   This policy has due regard to legislation including, but not limited to, the following:

- Regulation of Investigatory Powers Act 2000
- Protection of Freedoms Act 2012
- The UK General Data Protection Regulation
- Data Protection Act 2018
- Freedom of Information Act 2000
- The Education (Student Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- School Standards and Framework Act 1998
- Children Act 1989

- Children Act 2004
- Equality Act 2010

This policy has been created with regard to the following statutory and non-statutory guidance:

- Home Office (2013) 'The Surveillance Camera Code of Practice'
- ICO (2021) 'Guide to the UK General Data Protection Regulation (UK GDPR)'
- ICO (2017) 'In the picture: A data protection'

2.2   The Academy will only use CCTV for the safety and security of the site and its staff, students and visitors.

2.3   The Academy will only use CCTV as a deterrent and cameras will not be present in classrooms or changing facilities.

3   Data must be processed fairly and lawfully

3.1   Cameras are sited in such a way that they only monitor those spaces which are intended to be covered by the equipment.

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

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

4   Data can only be obtained for lawful purposes

4.1   Data obtained can only be used for the prevention or detection of criminal activity, the apprehension and prosecution of offenders or to assist in the investigation of accidents, incidents and near misses.

4.2   Access to CCTV images is restricted to only those who need to have access to the secure CCTV system.

4.3   A list of Academy staff who have authorised access to the CCTV system is available from the IT Support Team and is included here as Appendix 1.

5   Protocols

5.1   The main CCTV system is a digital system which records audio.

5.2   The CCTV system has been designed for maximum effectiveness and efficiency; however, the Academy cannot guarantee that every incident will be detected or recorded.

5.3   The CCTV system will not be trained on individuals unless an immediate response to an incident is required.

6   Security

6.1   Access to the CCTV system, software and data will be strictly limited to authorised operators and will be password protected.

6.2   The main control facility is kept secure and locked when not in use.

6.3   The systems will be tested for security flaws once a month to ensure that they are being properly maintained at all times.

6.4   CCTV systems will not be intrusive.

6.5   Any unnecessary footage captured will be securely deleted.

6.6   Any cameras that present faults will be repaired as soon as possible to avoid any risk of a data breach.

7   Access

7.1   Under the UK GDPR, individuals have the right to obtain confirmation that their personal information is being processed.

7.2   All recordings and any images belong to, and remain the property of, the Academy.

7.3   Individuals have the right to submit a Subject Access Request SAR to gain access to their personal data in order to verify the lawfulness of the processing. The Academy's Data Protection Policy provides further information about the use of data and how to make a SAR.

7.4   It is important that access to, and disclosure of, images and recordings using CCTV footage is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact, should the images be required for evidential purposes.

7.5   Releasing the recorded images to third parties will be permitted only in the following limited and prescribed circumstances, and to the extent required or permitted by law:

•   The police – where the images recorded would assist in a specific criminal inquiry
•   Prosecution agencies – such as the Crown Prosecution Service (CPS)
•   Relevant legal representatives – such as lawyers and barristers
•   Persons who have been recorded and whose images have been retained where disclosure is required by virtue of data protection legislation and the Freedom of Information Act 2000

7.6   Requests for access or disclosure will be recorded and the Principal will make the final decision as to whether recorded images may be released to persons other than the police.

8   Data shall be kept secure and not be kept longer than is necessary

8.1   The IT Support Team are responsible for generating checks to carry out the following:

i   Checking that the equipment performs properly:
ii   Ensuring any special features are accurate (e.g. time display):

iii   Reporting immediately if equipment is faulty or damaged:
iv   A daily check to ensure that the CCTV cameras are working.

8.2   Images are retained on the network for a period of up to 28 days. Downloads can be made by authorised users of the system for investigation purposes.

8.3   All CCTV saved footage must be reviewed every term by the member of staff who saved it and it will be deleted securely if it no longer serves a purpose.

9   General Information

9.1   We have CCTV internally in the main Academy, Legacy Suite and externally covering the Main Academy, Legacy Suite, entrances/exits and gates.

10   System Failure

10.1   Should any part of the CCTV system fail, for example cameras not working, video viewing not retrievable on any of the systems, this must be reported to the IT Support Team.

11   Other associated policies

Data Protection Policy

Appendix 1

Staff Access Rights

Level	Name	Title	Access
1	Various	IT Support Team and Site Manager	Full access and operational use, downloading, copying & viewing of CCTV footage.
2	Various	Executive Group, Learning Managers, SENCO and Parent Support.	Viewing of live and recorded footage and downloading. Learning Managers can additionally save downloaded images into a secure area on the Academy network.