

## CCTV POLICY

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## CCTV Policy

### 1. Introduction

1.1 School Partnership Trust Academies (SPTA) has in place, where applicable, closed circuit television ("CCTV") systems to provide a safe and secure environment for pupils, students, staff and visitors, and to protect SPTA property.

1.2 This document sets out the accepted use and management of the CCTV system and images to ensure SPTA complies with the Data Protection Act 1998 (DPA), Human Rights Act 1998 (HRA) and other legislation.

1.3 SPTA has produced this policy in line with the Information Commissioner's [CCTV Code of Practice](#).

1.4 There are a number of fixed cameras located at SPTA offices and at Academy sites. Live images from the system are on permanent view at each CCTV site in non-public areas. Recorded and live images from the cameras can be viewed by accessing the SPTA IT networks where CCTV operates. Access to the images is password protected and therefore restricted to a limited number of authorised staff.

### 2. Purpose of CCTV

2.1 SPTA has installed CCTV systems to:

- Protect SPTA's buildings and assets;
- Assist in the prevention and detection of crime;
- Assist in identifying, apprehending and prosecuting offenders;
- Assist in managing and running SPTA offices and its Academy sites; and
- Monitor the security of buildings.

2.2 The systems will be provided and operated in a way that is consistent with an individual's right to privacy.

2.3 The systems will not be used to:

- provide images to the world wide web;
- disclose to the media.

### **3. Owner**

3.1 The CCTV system is owned by SPTA for the SPTA office systems and by Academies for Academy site specific systems.

3.2 The day-to-day management of the CCTV system is the responsibility of the Facilities Manager for SPTA offices or the Principal or Designated Academy member of staff at Academies.

3.3 The Facilities Manager for SPTA offices or the Principal or Designated Academy member of staff at Academies is responsible for regularly checking and confirming the efficiency of the system and in particular that the equipment is properly recording and that cameras are working.

### **4. Overview of system**

- The CCTV system may run 24 hours a day, 7 days a week.
- The CCTV system is managed locally by the Facilities Manager for SPTA offices and by Principals or a Designated Academy member of staff at Academies.
- CCTV cameras are located at strategic points, principally at the entrance and exit point of sites and buildings. All cameras will be prevented from focusing on the frontages or rear areas of private homes, gardens or other areas of private accommodation.
- The cameras are mounted such that no images can be obtained through windows of toilet areas.
- CCTV signs will be prominently placed at strategic points and at entrance and exit points of the sites to inform staff, pupils, students, visitors and members of the public that a CCTV installation is in use.
- Although every effort has been made to ensure maximum effectiveness of the CCTV system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

### **5. Data Protection Act 1998**

5.1 SPTA will treat the systems based on its sites, 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 SPTA, its car parks and other areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of SPTA employees, together with its visitors, pupils and students.

5.2 For the purpose of the Data Protection Act 1998 SPTA is the Data Controller.

5.3 CCTV digital images, if they show a recognisable person, are personal data and are covered by the Data Protection Act 1998. This policy is associated with SPTA's Data Protection Policy, the provisions of which should be adhered to at all

times. The CCTV cameras must be administered and managed in accordance with the principles and objectives expressed in the Data Protection Policy and this CCTV Policy. The SPTA Data Protection Officer is Lucy Betteridge, Executive Assistant to Sir Paul Edwards, Lucy.betteridge@schoolpartnershiptrust.org.uk.

5.4 SPTA is required to register its processing of personal data with the Information Commissioner's Office (ICO). SPTA's ICO notification registration number is Z246444X.

5.5 Where new cameras are to be installed on SPTA premises, Part 4 of the ICO's CCTV Code of Practice will be followed before installation:

- The appropriateness of and reasons for using CCTV will be assessed and documented;
- The purpose of the proposed CCTV system will be established and documented;
- Responsibility for day-to-day compliance with this policy will be established and documented;
- Consultation with the Data Protection Officer is required to ensure that the CCTV system is covered by SPTA's Notification with the Information Commissioner's Office ("ICO").

## 6. Access to images

6.1 Access to images will be restricted to those staff that need to have access in accordance with the purposes of the system. Access to the images is to be strictly controlled by a password system managed by the Facilities Manager. Routine viewing of recorded images is to be limited to:

- the Facilities Manager or the Data Protection Officer for SPTA offices; and
- The Principal or Designated Academy staff member at Academies.

6.2 When circumstances require, the CEO, Data Protection Officer, Principal or Designated Academy staff member will have authority to allow other members of staff to view recorded images. Staff other than those listed above who view the recorded images will be recorded in a Register. Viewing of images by the Police will also be recorded in the Register

6.3 Members of staff with responsibility for recorded images must ensure that images are only held for a maximum of 45 days and are then overwritten.

6.4 Cameras will be pointed and focused on fixed points agreed in advance by the CEO or Principal.

6.5 Unless an immediate response to events is required, cameras must not be directed at an individual or a specific group of individuals. Covert surveillance is not to take place.

6.6 Disclosure of recorded material will only be made to third parties in strict

accordance with the purposes of the system and is limited to the following:

- Police and other law enforcement agencies where the images recorded could assist in a specific criminal enquiry and / or the prevention of terrorism and disorder;
- Prosecution agencies;
- Appropriate members of SPTA staff;
- Appropriate legal representatives; and
- People whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal enquiries).

6.7 All requests for the release of images should be referred to the SPTA Data Protection Officer. A record will be maintained of the release of images to the Police or other authorised applicants. Requests by the Police can only be actioned under Section 29 of the Data Protection Act 1998.

6.8 Should images be required as evidence, a copy may be released to the Police under their evidence guidelines. Images will only be released to the Police on the clear understanding that the image remains the property of SPTA, and both the images and associated information are to be treated in accordance with this Policy. SPTA also retains the right to refuse permission for the Police to pass the images to any other person.

6.9 Applications received from outside bodies (e.g. solicitors) to view or release images will be referred to the CEO for SPTA offices or the Principal for Academy sites. In these circumstances images will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request or in response to a Court Order. A fee may be charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

## **7. Individual access rights**

7.1 The Data Protection Act 1998 gives individuals the right to access personal information about themselves, including CCTV images.

7.2 All requests for access to a copy of CCTV footage by individuals should be made in writing to the SPTA Data Protection Officer, using the form in Appendix A.

7.3 Requests for access to CCTV images must include:-

- The date and time the images were recorded;
- Information to identify the individual, if necessary;
- The location of the CCTV camera; and
- Proof of Identity.

7.4 SPTA will respond promptly and at the latest within 40 calendar days of receiving the £10 request processing fee and sufficient information to identify the images requested.

7.5 If SPTA cannot comply with the request, the reasons will be documented.

7.6 The requester will be advised of these in writing, where possible.

## **8. Retention and disposal**

8.1 Unless required for evidential purposes or the investigation of crime or otherwise required by law, recorded images will be retained for no longer than 45 days from the date of recording.

8.2 At the end of their useful life all images on discs will be erased and securely disposed of as confidential waste. All still photographs and hard copy prints also will be securely disposed of as confidential waste.

## **9. Maintenance and review**

9.1 This Policy will be reviewed three years or when there are changes to relevant legislation.

## **10. Breaches of the Policy (including breaches of security)**

10.1 Any breach of the Policy by SPTA staff will be investigated in accordance with the SPTA disciplinary policy.

## **11. Complaints**

11.1 Any complaints about the CCTV system will be dealt with in accordance with the SPTA complaints policy. This can be found on the SPTA website.

This form should be used for routine requests for access to view CCTV images by individuals whose images have been captured and/or uniformed police in response to incidents which occurred on the same day e.g. to assist in a specific criminal enquiry, identify a victim, witness or perpetrator in relation to a criminal incident.

This form should **not** be used where the police or other law enforcement agencies request a copy of CCTV images. A Section 29 request should be made under the Data Protection Act 1998 for this type of access. Please refer to the Data Protection Officer.

This form should **not** be used an individual whose image has been recorded requests a copy of CCTV images relating to themselves. A subject access request under the Data Protection Act 1998 is required for this type of access. Please refer to the Data Protection Officer.

**To be completed by Applicant**

Date	
Person making Request	
Organisation	
Reason for request	
Crime reference number	

**To be completed by SPTA representative**

Reason for allowing access/disclosure	
Reason for refusing access/disclosure	
Name & Signature	
Position	
Date	