



# KING JAMES I ACADEMY

## CCTV Policy

Date adopted by Governors: November 2018

Date of Next Review: November 2020

## **Introduction**

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at King James I Academy ('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 Code follows Data Protection Act 1998 and GDPR guidelines and will be subject to reviews, every 2 years. The CCTV system is owned by the Academy.

The Academy also uses IRIS Lesson Observation Technology for professional development purposes.

## **Objectives of the CCTV scheme**

The system has been installed by the Academy with the primary purpose of reducing the threat of crime, protecting the Academy's assets and helping to ensure the safety of all staff, students and visitors consistent with respect for the privacy of individuals. These purposes will be achieved by

- Deterring criminal activity by the use of signs displaying that a CCTV installation is in use around the estate
- Assisting in the prevention and detection of crime
- Facilitating the identification, apprehension and prosecution of offenders in relation to crime and public order
- Facilitating in the management of the Academy
- Promoting Health & Safety in the Workplace

## **Statement of intent**

The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 1998/GDPR and will seek to comply with the requirements both of the Data Protection Act 1998/GDPR, the Surveillance Camera Code of Practice and the ICO 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. All data held will be:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- handled according to people's data protection rights
- kept safe and secure
- not transferred outside the European Economic Area without adequate protection

Cameras will be used to monitor activities within the Academy and its car parks and other public areas 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 where it is necessary in order to achieve the purpose.

Static cameras are not to focus on private homes, gardens and other areas of private property.

CCTV Footage may be referred to as part of an investigation to assist in providing evidence.

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 relevant areas to inform staff, students, visitors and members of the public that CCTV is in place.

### **Covert Monitoring**

The Academy may in exceptional circumstances set up covert monitoring.

For example:

- Where there is good cause to suspect that unauthorised action(s) are taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation will be obtained from Head teacher and reasons for the decision will be clearly documented and regularly reviewed.

- Covert monitoring must cease following completion of an investigation or where it is no longer considered necessary to achieve the purposes.
- 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.

### **Operation of the system**

- The system will be administered and managed by the Head teacher, in accordance with the principles and objectives expressed in the code.
- The day-to-day management will be the responsibility of both the Finance Director and ICT Manager.
- The data storage PCs & monitors will be in a locked room at all times (Finance Director's Office) and contain appropriate security including anti-virus and firewall software.
- The CCTV system will be operated 24 hours each day, every day of the year.
- Signs will be placed at relevant areas to inform staff, students, visitors and members of the public that CCTV is in place.
- These signs will indicate that CCTV monitoring and recording are in use on the premises.

### **Recording of CCTV images**

Images will be recorded and normally kept in a way that maintains the integrity of the information for 30 days, and in any event will be kept for no longer than is necessary to achieve the purposes, after which time they will be erased. Longer retention periods may be

used where there is a specific business need or justification. This will be authorised by the Finance Director. The eventual date of erasure will also be recorded and systematic checks will be completed to ensure the retention period is being complied with in practice.

### **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.

### **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 & detection or health and safety purposes may do so.

All viewings of recorded images must be authorised by the Head teacher, Deputy Head Teacher or Finance Director.

### **Disclosure to third parties**

Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and the Data Protection Act 1998/GDPR. All such requests will be referred to the Head teacher and the Finance Director. A record will be kept of the reasons for disclosing the data and details of who the data has been disclosed to (the name of the person and the organisation they represent). Once the data has been disclosed to a third party, such as the police, they will become the data controller for the purposes of the Data Protection Act 1998/GDPR.

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

### **Data Protection Act/GDPR**

Individuals have the right to request access to CCTV footage relating to them under the Data Protection Act/GDPR. Requests must be directed to the Academy's Data Protection Officer. 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.

### **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.

### **Complaints**

Any complaints about the Academy's CCTV system should be addressed in writing to the Finance Director.

**Example Disclosure Record Sheets:**

**CCTV Log of Disclosures**

<b>No.</b>	<b>Date</b>	<b>Recording Date</b>	<b>Reason</b>	<b>Copy Taken By</b>	<b>Signature</b>	<b>Authorise d By</b>	<b>Signature Confirming Destruction</b>