

POLICIES AND PROCEDURES

CCTV POLICY

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CCTV POLICY

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SECTION 1: CCTV POLICY

1.1 Introduction

- 1.1.1 Under the Protection of Freedoms Act 2012 the processing of personal data captured by CCTV systems (including images identifying individuals) is governed by the Data Protection Act and the Information Commissioner's Office (ICO) has issued a code of practice on compliance with legal obligations under that Act.
- 1.1.2 The use of CCTV by schools is covered by the Act, regardless of the number of cameras or how sophisticated the equipment is.
- 1.1.3 This policy sets out the CCTV policy of the Trust.

1.2 Purpose

- 1.2.1 This CCTV policy explains how Tapton School Academy Trust will operate its CCTV equipment and comply with the current legislation.
- 1.2.2 The schools within the Trust use CCTV equipment to provide a safer, more secure environment for pupils and staff and to prevent bullying, vandalism and theft. Essentially it is used for:
- The prevention, investigation and detection of crime.
 - The apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings).
 - Safeguarding public, pupil and staff safety.
 - Monitoring the security of the site.
 - The school does not use the CCTV system for covert monitoring.

1.3 Location

- 1.3.1 Cameras are located in those areas where the school has identified a need and where other solutions are ineffective. The school's CCTV system is used solely for purposes(s) identified above and is not used to routinely monitor staff conduct.
- 1.3.2 Cameras will only be used in exceptional circumstances in areas where the subject has a heightened expectation of privacy e.g. changing rooms or toilets. In these areas, the school will use increased signage in order that those under surveillance are fully aware of its use.

1.4 Maintenance

1.4.1 Please see Appendix 1 for all CCTV maintenance information.

1.4.2 The contractors are responsible for:

- Ensuring the school complies with its responsibilities in relation to guidance on the location of the camera.
- Ensuring the date and time reference are accurate.
- Ensuring that suitable maintenance and servicing is undertaken to ensure that clear images are recorded.
- Ensuring that cameras are protected from vandalism in order to ensure that they remain in working order.

1.5 Identification

1.5.1 In areas where CCTV is used the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

1.5.2 The signs will:

- Be clearly visible and readable.
- Contain details of the organisation operating the scheme, the purpose for using CCTV and who to contact about the scheme.
- Be an appropriate size depending on context.

1.6 Type of equipment

1.6.1 The school's CCTV cameras record visual images and sound.

SECTION 2: APPLICATION

2.1. Image storage, viewing and retention

1.6.2 Recorded images/audio will be stored in a way that ensures the integrity of the image/audio and in a way that allows specific times and dates to be identified.

1.6.3 Access to live images/audio is restricted to the CCTV operators unless the monitor displays a scene which is in plain sight from the monitored location.

1.6.4 Recorded images/audio can only be viewed in a restricted area by approved staff.

1.6.5 The school reserves the right to use images/audio captured on CCTV where there is activity that the school cannot be expected to ignore such as criminal activity,

potential gross misconduct, or behaviour which puts others at risk.

- 1.6.6 Images/audio retained for evidential purposes will be retained in a locked area accessible by the system administrator only.
- 1.6.7 Where images/audio are retained, the system administrator will ensure the reason for its retention is recorded, where it is kept, any use made of the images/audio and finally when it is destroyed.
- 1.6.8 Neither the Data Protection Act nor the Information and Records Management Society prescribe any specific minimum or maximum periods which apply to CCTV recorded images/audio. The school ensures that images/audio are not retained for longer than 31 Days. Once the retention period has expired, the images/audio are erased.

2.2 Disclosure

- 2.2.1 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 school where these would reasonably need access to the data (e.g. investigators).
- 2.2.2 Requests should be made in writing to the Trust Information Officer.

2.3 Subject access requests

- 2.3.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act. They have the right to request a copy of the information relating to them or if they give consent to view that information.
- 2.3.1 All requests should be made in writing to the Trust Information Officer. 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.
- 2.3.2 The Trust Information Officer will respond to requests promptly within no longer than 40 calendar days of receiving the request and fee.
- 2.3.3 A fee of £10 will be charged per request.
- 2.3.4 Tapton School Academy Trust reserves the right to refuse access to CCTV footage at any of its Academy School Sites where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.
- 2.3.5 If the Trust receives a request under the Freedom of Information Act it will comply with requests within 20 working days of receiving the request. As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and its disclosure is unlikely as a Freedom of Information request

2.3.6 Refusal to disclose images/audio may be appropriate where its release is:

- Likely to cause substantial and unwarranted damage to that individual.
- To prevent automated decisions from being taken in relation to that individual.

SECTION 3: MONITORING AND EVALUATION

3.1 The school 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.

3.2 This policy will be in force until 31st March 2019, unless legislation is updated prior to that date when it will be reviewed.

SECTION 4: ROLES AND RESPONSIBILITIES

4.1 If the Trust decides to change the way in which it uses CCTV, it will inform the Information Commissioner within 28 days.

4.2 It is the responsibility of the Board of Directors as the Data Controllers of TSAT to report any changes or breaches to the ICO through the TSAT Information officer on the Company's behalf.

Appendix 1 – Maintenance contracts by school:

School Name	CCTV Maintenance contract
Southey Green Primary School	The CCTV system is maintained by Comms Provider, The Continuum, Moderna Business Park, Mytholmroyd, West Yorkshire, HX7 5QQ under an annual maintenance contract that includes periodic inspections.
Chaucer School	The CCTV system is maintained by Comms Provider, The Continuum, Moderna Business Park, Mytholmroyd, West Yorkshire, HX7 5QQ under an annual maintenance contract that includes periodic inspections.
Tapton School	The CCTV system support is split by external and internal cameras. The external system is monitored by Interserve and maintained by Thompson Audio Visual, Thompson House, Gorsebrook Rd, Wolverhampton, WV10 6JD. The internal system is monitored by on-site technicians, there is currently no annual maintenance contract with an external provider.
Forge Valley School	The CCTV system support is split by external and internal cameras. The external system is monitored by Protec Fire Detection PLC, Unit 1, Ashfield Court, Whitehall Road, Leeds, LS12 5JB, support is provided under an annual maintenance contract that includes periodic inspections. The internal system is monitored by Civica.