CCTV Usage Policy

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Ownership:	Head of Finance
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Signed by Governors:	June 2016

History of Policy Changes

Date	Version	Change	Origin of Change e.g. TU request, change in legislation	Changed by
June 2016	1	New Policy		DL

1. Policy statement

1.1 Priory Community School – An Academy Trust (the School) uses closed circuit television (CCTV) and the images produced to prevent or detect crime, to monitor its buildings and grounds in order to provide a safe and secure environment for its students, staff and visitors, to support the effective management of student behaviour, to facilitate the identification of any activity or event which might warrant disciplinary action being taken against students or staff, and to prevent loss or damage to its property.

1.2 The system comprises a number of fixed cameras, images from which are transmitted to and stored on a Network Video Record (NVR) which is located in the IT Server Room. Access to the system is via password encrypted software which is held on electronic devices nominated by the Head of Finance.

1.3 Appended to this policy is a plan showing the location of all of the cameras. The system does not have sound recording capability. The system operates 24 hours a day, 365 days a year.

1.4 The CCTV system is owned and operated by the School, the deployment of which is determined by the School's Governing Body. The day to day operation of the system is managed by the Head of Finance who is supported in the administration of the system by selected members of the Leadership, Site, HR and IT teams.

1.5 The School's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998 (the DPA). The use of CCTV, and the associated images are covered by the Data Protection Act 1998. This policy outlines the School's use of CCTV and how it complies with the DPA.

1.6 The operation of the system and this policy will be reviewed annually by the Governing Body and will include, as appropriate, consultation with interested parties.

2. Statement of Intent

2.1 The School complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use.

2.2 CCTV warning signs are clearly and prominently placed at the main reception areas of the School site (the Main Office, Pre-School and PRC).

2.3 The original planning, design and installation of CCTV equipment endeavoured to ensure that the system will deliver maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

2.4 Materials or knowledge secured by way of CCTV will not be used for any commercial purpose. Recorded materials will only be released to the media with the written authority of the Police or a Court of Law, typically for use in the investigation of a specific crime.

3. Access

3.1 Access to the system will be strictly limited to selected members of the Leadership, Office, Site, HR and IT teams who will receive appropriate instruction on their legal and organisational responsibilities and the terms of the ICO CCTV Code of Practice.

3.2 Cameras may not be relocated or re-positioned without the agreement of the Head of Finance.

4. Covert Monitoring

4.1 It is not the School's policy to conduct 'covert monitoring' unless there are 'exceptional reasons' for doing so.

4.2 The School may, in exceptional circumstances, determine a sound reason to set up covert monitoring. For example: i) Where there is good cause to suspect criminal activity or malpractice is taking place, or where there are grounds to suspect serious misconduct; ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording. In these circumstances authorisation must be obtained from the Governing Body and the School's 'Data Controller' advised before any commencement of such covert monitoring.

4.3 Covert monitoring must cease following completion of an investigation.

4.4 Covert monitoring will not be undertaken for the purposes of assessing an employee's performance at work.

5. Storage and Retention of CCTV images

5.1 Recorded data will be retained on the NVR for 30 days after which it will be automatically overwritten.

5.2 The Network & Systems Manager will, subject to the prior approval of the Head of Finance, produce a DVD of an incident or occurrence. The Network Manager must maintain a log of all such requests including, the date of the request, the date and time of and a brief description of the images requested, the number of copies produced, and to whom the DVD(s) was/were given. The Head of Finance will require that such DVD's are kept in secure storage, whether on or off the School site, as a condition of his approval.

6. Subject Access Requests (SAR)

6.1 The DPA provides that "Data Subjects" (individuals to whom "personal data" relates) with a right to request copies of data held by others about themselves which may include CCTV images.

6.2 If the Data Subject is not the focus of the footage ie. they have not been singled out or had their movements tracked then the images are not classified as "personal data" and the Data Subject/individual is not entitled to the image under the DPA.

6.3 All requests should be made in writing to the Data Controller (Head of Finance). 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.

6.4 The School will respond to requests within 40 calendar days of receiving the written request and any fee. This is as per the ICO CCTV Code of Practice.

6.5 A fee of £10 may be charged per request.

6.6 The School 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.

7. Access to and Disclosure of Images to Third Parties

7.1 There will be no disclosure of recorded data to third parties other than as required by law and to authorised personnel such as service providers to the School where these would reasonably need access to the data (e.g. investigations).

7.2 Requests for images / data should be made in writing to the Data Controller (Head of Finance, Martin Kerslake).

7.3 Images captured via the system may be used for the purposes of the School's student behaviour and staff discipline and grievance procedures subject to the terms of this policy and to the confidentiality requirements of those procedures.

8. Complaints

8.1 Complaints and enquiries about the operation of CCTV within the School should be directed to the Head of Finance in the first instance.


PRE SCHOOL
STL1 STL2
RTL
STL
STL3
H7
H8
H9
H6
H2
H3
H4
H5
L3
L4
L2
L5
LIBRARY
STAFF ROOM
RESTAURANT
RESTAURANT
RESTAURANT
RESTAURANT
TC1
TC2
TC3
S9
E9
E10
E11
E12
PE1
M4
M3
M5
M2
M6
M8
M7
M9
IT3
IT1
IT4
IT2
MU1
SCHOOL HALL
E1
E2
E3
E4
E5
E6
E7
E8
CARETAKING
ART1
ART2
CD1
IT5
CDSYS
CD3
CD2
DRAMA
CDTEX
CDF1
CDF2
S8
S1
S2
S3
S4
S6
S5
S7
GYMNASIUM
SPORTS HALL
FITNESS GYM