



MacIntyre Academies

Endeavour Academy

CCTV Policy

Version 2

| Version: | Changes/Updates | Responsibility: | Date: |
|----------|--|-----------------|---------------|
| V2 | Changed pupils to students throughout. Updated list of names of check list. | M. Soporova | March 2022 |

| | |
|-----------------------------|---------------|
| Person Responsible: | Principal |
| Type of policy | Non Statutory |
| Date of first draft: | October 2019 |
| Date of staff consultation: | N/a |
| Date adopted by the LAB: | November 2019 |
| Date of implementation: | November 2019 |
| Date reviewed: | April 2022 |
| Date of next review: | April 2023 |

Introduction

- 1.1 Endeavour Academy uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitor the school buildings and grounds in order to provide a safe and secure environment for its students, staff and visitors, and to prevent loss or damage to school property.
- 1.2 The system comprises a number of fixed and dome cameras.
- 1.3 The system does not have sound recording capability.
- 1.4 The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team / Business Manager.
- 1.5 The CCTV is monitored centrally from the Business Managers office and/or the Facilities Managers Office. Access to the images is controlled by the Business Manager, or in their absence, the Facilities Manager and is password protected. The Principal has access at all times.
- 1.6 The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and members of the school community.
- 1.7 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images are covered by GDPR 2018. This policy outlines the school's use of CCTV and how it complies with the Act.
- 1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. Through this policy, all operators are made aware of their responsibilities in following the CCTV Code of Practice. The school's 'Data Controller' (SBM) will ensure that all employees are aware of the restrictions in relation to access to, and disclosure of, recorded images by publication of this policy.

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. The Code of Practice is published at:
<https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>
- 2.2 CCTV warning signs are clearly and prominently placed at the main external entrance to the school, including further signage in other outdoor areas in close proximity to camera positions. Signs will contain details of the purpose for using CCTV (see appendix B). In areas where CCTV is used, the school will ensure that there are prominent signs placed within the controlled area.
- 2.3 The original planning, design and installation of CCTV equipment endeavoured to ensure that the scheme 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.

3. Siting the Cameras

- 3.1 Cameras are sited so that they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with GDPR.
- 3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which includes outdoor/indoor areas.
- 3.3 Members of staff will have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

4. Covert Monitoring

- 4.1 It is not the school's policy to conduct 'Covert Monitoring'.

5. Storage and Retention of CCTV images

Recorded data will not be retained for longer than 31 days except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue. Where data is retained for longer than 31 days an electronic file held on a secure central server where specific CCTV image/recordings are retained will be kept.

The Data Protection Act and GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention will reflect the School's purposes for recording information, and how long it is needed to achieve this purpose.

The School will store data securely at all times, ensuring that CCTV footage is destroyed in line with legal requirements when it falls outside of its retention period.

6. Access to CCTV images

- 6.1 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

7. Subject Access Requests (SAR)

- 7.1 Individuals have the right to request access to CCTV footage relating to themselves under GDPR.
- 7.2 All requests should be made in writing to the Principal. 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.
- 7.3 The school will respond to requests within 30 calendar days of receiving the written request and any fee. This is as per the ICO CCTV Code of Practice.
- 7.4 A fee of £10 may be charged per request. This is as per the ICO CCTV Code of Practice.
- 7.5 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.

8. Access to and Disclosure of Images to Third Parties

- 8.1 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).
- 8.2 Requests for images / data should be made in writing to the Principal.
- 8.3 The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

9. Complaints

- 9.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Principal in the first instance.

Further Information

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition 2017 (published by the Information Commissioners Office) Version 1.2
- www.ico.org.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- GDPR (May 2018)

Appendix A – Checklist

This CCTV system and the images produced by it are controlled by the Business Manager who is responsible for how the system is used under direction from the schools 'Data Controller'. The school notifies the Information Commissioner about the CCTV system, including any modifications of use and/or its purpose (which is a legal requirement of GDPR 2018).

Endeavour Academy has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of the schools community. It will not be used for other purposes. The school will conduct regular reviews of our use of CCTV.

| Checked (date if appropriate) | | By | Date of next review |
|--|-----|--------------------------------------|--------------------------|
| Notification has been submitted to the Information Commissioner and the next renewal date recorded. | Yes | Gemma Deehan | Renewal March 2023 |
| There is a named individual who is responsible for the system. | Yes | Jane Grant/Luke Whatley | |
| A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required. | Yes | Jane Grant | |
| Staff and members of the school community will be consulted about any proposal to install/amend CCTV equipment or its use as appropriate. | Yes | Michaela Soporova / Jane Grant | |
| Cameras have been sited so that they provide clear images. | Yes | Jane Grant | |
| Cameras have been positioned to avoid capturing the images of persons not visiting the premises. | Yes | Jane Grant | |
| There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s). | Yes | Luke Whatley | |
| Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them. | Yes | Jane Grant/Luke Whatley | |
| The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated. | Yes | Jane Grant/Luke Whatley | |
| Except for law enforcement bodies, images will not be provided to third parties. | Yes | Jane Grant | |
| The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the data controller knows to seek advice from the Information Commissioner as soon as such a request is made. | Yes | Michaela Soporova / Jane Grant | |
| Regular checks are carried out to ensure that the system is working properly and produces high quality images | Yes | Luke Whatley | |

Appendix B – CCTV Signage

It is a requirement of GDPR 2018 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for any enquiries



Example sign.