

Swift Academies

CCTV Policy

Accepted by: Board of Directors May 2018

Approving Body : Board of Directors

Committee : Standards

Review Cycle: 2 years

Last reviewed: May 2018

Date for next review: May 2021

1. Introduction

- 1.1 Swift Academies uses closed circuit television (CCTV) images to provide a safe and secure environment for pupils, staff and visitors, and to protect School property.
- 1.2 The purpose of this Policy is to regulate the management, operation and use the CCTV system at Swift Academies's schools.
- 1.3 This Policy is intended to ensure that the School operates the CCTV system in compliance with General Data Protection Regulation 2018 (GDPR), the Information Commissioner's CCTV Code of Practice and other relevant legislation.

2. Purpose of the CCTV System

- 2.1 The School's have installed the CCTV system to:
 - Deter crime
 - Increase personal safety and reduce the fear of crime
 - Assist in the prevention and detection of crime
 - Assist with the identification, apprehension and prosecution of offenders
 - Protect the School buildings and property
 - Assist with the identification of actions that might result in disciplinary proceedings against pupils and staff
 - Assist in the management and monitoring of school facilities including the investigation of accidents
 - and as a means of providing assistance to staff in the case of emergency situations
- 2.2 The systems comprises of a number of cameras, some of which are static and some which can be moved by the operator. These cameras are located around the school building and sites. The location and type of each camera is detailed in the School's CCTV Operating File.
- 2.3 The CCTV system includes cameras covering:
 - The Rydal Academy's grounds
 - Longfield Academy grounds, Sports Hall and 3G pitches

- 2.4 The CCTV systems are owned and operated by the School's, although maintenance agreements are in place. The Headteacher/Head of School have overall responsibility for the CCTV systems. The Swift Academies ICT Support Team are responsible for the day-to-day operation of the systems.
- 2.5 The servers which support the cameras and record the images captured are kept in secure locations to which only authorised staff have access. The Schools will treat the systems and all information, documents and recordings obtained and used as data which is protected by General Data Protection Regulation 2018 (GDPR) and viewing and copying of the images will be strictly controlled. Provision of images to external agencies will only be provided in line with paragraph 4.5 below.
- 2.6 The images captured by the cameras are recorded continuously and, with the exception of 3.2 below, the images are only viewed when there has been a specific event regarding which camera images are required.

3. Design and Operation of the System

- 3.1 The static cameras have been directed where they will not focus on private homes, gardens and other areas of private property. Their positioning will be checked on a regular basis by ICT staff to ensure that they have not moved and this will be recorded in the CCTV Operating File.
- 3.2 Camera's which have automated pattern of movement but which can also be directed by the operator are sited:
- The Rydal Academy 1) Nursery roof, 2) Field/MUGA area to sweep the site for security monitoring.
 - Longfield Academy 3G pitch and in addition to the general functions of the system is used to assist in managing the facility and supporting members of staff in emergency circumstances. Live images from this camera and all other cameras are regularly monitored at times when the facilities are being hired by community users as well as the images being recorded on a continuous basis.
- 3.3 Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals. The exception to this would be in cases where written authorisation has been obtained from the Headteacher/Head of School for directed surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.
- 3.4 Warning signs have been placed at all entrances to the CCTV area and, in addition, further reinforcing signs have been posted inside the area. All signage in terms of location and content is compliant with the Information Commissioner's Code of Practice.

4. Viewing and Storing the Images

- 4.1 The following members of staff are authorised to view images captured by the CCTV system:
- Members of the Senior Leadership Team

- Members of the Swift Academies ICT Support Team
 - Site Staff
 - Sports Hall reception staff (Longfield)
 - Swift Academies Trust Business Manager
 - Any other staff as required to assist in the identification of pupils
- 4.2 As detailed in 3.2 above, Longfield Sports Hall reception staff will be able to view live images of the system at times when the School facilities are being used after the school day, during school holidays and at weekends. Generally, other staff will only view images when they have been alerted to a particular incident which has happened or is ongoing.
- 4.3 Images from the CCTV system can be viewed:
- The Rydal Academy – at a secure access terminal in a restricted access area.
 - Longfield Academy - at any computer in the School . Access to the system is controlled through by a login name and password. Only members of staff stated at paragraph 4.1 will be allocated a login and password to the system. .
- 4.4 Viewing of images will only take place in restricted areas to which other employees and pupils will not have access while viewing is occurring. The exception to this is when images are being viewed at the Longfield Sports Hall Reception desk. In this case the monitor will be angled to prevent anyone, other than the operator, viewing the images on the screen. When the evening receptionist is not at the Reception desk they must ensure that a password protected screensaver must be activated.
- 4.5 Images captured by the system will only be used for internal purposes and will only be shared with law enforcement agencies where a crime needs to be investigated. Any other requests for images should be refused, except in some very limited circumstances where it may be appropriate to release images to a third party. In such cases the agreement of the Headteacher/Head of School must be sought before this information is released. A fee may be charged for the provision of this information in line with the School's Data Protection Policy.
- 4.6 Materials or images secured as a result of CCTV will not be used for any commercial purpose or released to the media.
- 4.7 When images are provided to any external body, including the police, this will be done by downloading information onto a CD. The following information will be recorded in the CCTV Operating File for every CD produced:
- The date and time the CD was provided to the external body
 - The details of the person to whom the CD has been provided, including their employing organisation and contact details
 - The date and time covered by the images on the CD and the cameras on which they have been captured
 - The person transferring the images onto the CD
- 4.8 Information stored on the system constitutes personal data as defined by General Data Protection Regulation 2018 (GDPR). An individual may ask to see images of them self

through a subject access request under the Act. Such requests will be dealt with in line with the Data Protection Policy.

- 4.9 There will be no disclosure of recorded data to third parties other than to authorised organisations such as the police and others given permission by the Head Teacher/Head of School for a specific purpose, for example other investigations (see 4.5).

5. Retention

- 5.1 Images recorded by the system will not be kept any longer than is necessary and for a maximum of 2 months except in circumstances such as where a law enforcement body is investigating a crime, the footage is required for insurance purposes or as part of an ongoing investigation. In such cases these images will be downloaded onto a disc and secured in the safe. Access to this safe is limited to the Swift Academies ICT Network Team. A record will be kept in the CCTV Operating File of any images kept after the 2 month time period and the reason for this.

6. Maintenance of the System

- 6.1 The Swift Academies ICT Support Team will check and confirm the efficiency of the system on a regular basis. In particular he will ensure that the equipment is properly recording, that cameras are functional, that image quality is suitable for the purpose for which it is intended and that the date and time stamp on the images is accurate. These checks will be recorded in the CCTV Operating File.
- 6.2 Any maintenance, planned or unplanned, will be recorded in the CCTV Operating File as will any alterations to the CCTV system. In the event that the CCTV system is altered, for example if further cameras are added, then this policy will be reviewed to ensure it is still up-to-date and accurate.

7. Breaches of the Code

- 7.1 Any breach of this Policy by Trust staff will be initially investigated by an officer appointed by the Headteacher/Head of School and may be dealt with under the Disciplinary Procedure. In the event of a serious breach, which may constitute a criminal offence, the matter will be referred to the police prior to an internal investigation being instigated.
- 7.2 Any complaints about the operation of the CCTV system should be addressed to the Headteacher/Head of School and dealt with under the School's complaints procedure.

8. Staff Guidance and Training

- 8.1 All staff will be made aware of the CCTV Policy and it will be published on the Swift Academies website.
- 8.2 Staff authorised to operate the system and view images will be provided with guidance and training on their obligations under this Policy and recognising subject access requests. Staff will be asked to confirm their understanding of the Policy and the requirements of the General Data Protection Regulation 2018 (GDPR) and the Information Commissioner's Code of Practice. A declaration form is attached at Appendix 1 for this purpose.

9. Review of the Policy

- 9.1 The Policy will be subject to review periodically, but at least bi-annual, to include consultation as appropriate with relevant parties.

I confirm that I have received, read and understand the Swift Academies CCTV Policy. I understand that:

- The purpose of the Policy is to ensure the operation of CCTV systems complies with the General Data Protection Regulation 2018 (GDPR), the Information Commissioner's CCTV Code of Practice and other relevant legislation;
- That images captured by the system are personal data under the Data Protection Act and the provisions of this act apply with regard to processing information obtained from the system;
- I should not allow any unauthorised person to view images from the system or share my login and password with anyone;
- I should not direct cameras at an individual, their property or a specific group of individuals unless for the purposes detailed under the policy;
- Materials or images secured as a result of CCTV may not be used for any commercial purpose or released to the media. Any requests for images will be dealt with in line with the Schools Data Protection Policy;
- Breach of the Policy by School staff will be investigated and may be dealt with under the Disciplinary Procedure

Signed: _____ Date: _____

Name: _____ Job Title: _____