



ANGLIAN LEARNING

CCTV POLICY

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MEMBER OF STAFF WITH RESPONSIBILITY FOR REVIEW:	DIRECTOR OF IT
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1. Introduction

- 1.1 Anglian Learning has in place CCTV surveillance systems across its sites. This policy details the purpose use and management of the CCTV system at the Trust (Anglian Learning) and details the procedures to be followed in order to ensure that the Trust complies with the General Data Protection Regulations (GDPR), the Data Protection Act and the current Information Commissioner's Office (ICO) Code of Practice.
- 1.2 The Trust will have due regard to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998.
- 1.3 This policy and the procedures therein detailed, applies to all of the Trust's CCTV systems and any other system capturing images of identifiable individuals for the purpose of viewing and/or recording the activities of such individuals. CCTV images are monitored and recorded in accordance with this policy.

2. CCTV System overview

- 2.1 The CCTV systems are owned by the Trust and managed by the Trust and its appointed agents, which include any management or maintenance companies that may be appointed. Under the Data Protection Act 1998 and GDPR, the Trust is the 'data controller' for the images produced by the CCTV system.
- 2.2 The Director of ICT is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.
- 2.3 The CCTV systems operate across all of the sites. Details of the number of cameras and their location can be obtained by contacting the Director of ICT.
- 2.4 Signs are placed at relevant points to inform people that CCTV cameras are operational in that area.
- 2.5 The Director of Operations is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
- 2.6 Cameras are sited to ensure that they cover Trust premises as far as is possible. Cameras are installed throughout the Trust's sites within buildings and externally in vulnerable public facing areas.
- 2.7 Cameras are primarily sited to focus on communal areas of the school sites, but may also be used in rooms for the protection of people and assets, where considered necessary by the Principal and subject to a Privacy Impact Assessment being conducted.
- 2.8 Where cameras are within sight of private areas, such as residential, the use of 'privacy masks' is implemented, such that privacy in these physical areas can be maintained.
- 2.9 The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.
- 2.10 Any proposed new CCTV installation is subject to a Privacy Impact Assessment.

3. Purposes of the CCTV system

- 3.1 The main purposes of the Trust's CCTV system are as follows:

- for the prevention, reduction, detection and investigation of crime and other incidents;
 - to ensure the safety of staff, students and visitors;
 - to assist in the investigation of suspected breaches of Trust regulations by staff or students
- 3.2 The CCTV system will be used to observe the Trust's sites and areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.
- 3.3 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose or for purposes of entertainment.

4. Monitoring and Recording

- 4.1 Cameras are monitored by the Site Team, Behaviour Team and selected members of the Senior Leadership Teams. Where specific operations are in place, such as Sports Centres, access to relevant camera feeds to these personnel is provided. The system is supported by the Director of Operations and Technical Services Team.
- 4.2 Images are recorded centrally on servers located securely in the school and are viewable by the CCTV users listed in 4.1. Additional staff may be authorised by the Headteacher of the school to monitor cameras sited within their own areas of responsibility on a view only basis.
- 4.3 The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed and the cameras are checked regularly to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.
- 4.4 All images recorded by the CCTV System remain the property and copyright of the Trust.
- 4.5 The monitoring of staff activities will be carried out in accordance with Part 3 of the Employment Practices Code (ICO).
- 4.6 The use of covert cameras will be restricted to very rare occasions, when a series of criminal acts have taken place within a particular area that is not otherwise fitted with CCTV. A request for the use of covert cameras will clearly state the purpose and reasons for use and the authority of the Chief Executive Officer will be sought before the installation of any covert cameras. The CEO should be satisfied that all other physical methods of prevention have been exhausted prior to the use of covert recording.
- 4.7 All such monitoring will be fully documented and will only take place for a limited and reasonable period.

5. Compliance with Data Protection Legislation

- 5.1 In its administration of its CCTV system, the Trust complies with the GDPR and the Data Protection Act. Due regard is given to the data protection principles embodied in the GDPR and Data Protection Act. These principles require that personal data shall be:
- 5.1.1 processed lawfully, fairly and in a transparent manner;
 - 5.1.2 collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
 - 5.1.3 adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
 - 5.1.4 accurate and, where necessary, kept up to date;

- 5.1.5 kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed; and
- 5.1.6 processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

6. Applications for disclosure of images

- 6.1 Requests by individual data subjects for images relating to themselves 'Subject Access Request' should be submitted in writing to the Director of ICT with proof of identification.
- 6.2 In order to locate images on the Trust's system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.
- 6.3 Where the Trust is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.
- 6.4 A record of any disclosure made under this policy will be held on the CCTV management system, itemising the date, time, camera, requestor, authoriser and reason for the disclosure.

7. Access to and disclosure of images to third parties

- 7.1 A request for images made by a third party should be made in writing to the Headteacher. The Police may request images verbally as part of an investigation but the request must be logged by the academy.
- 7.2 In limited circumstances, it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.
- 7.3 Such disclosures will be made at the direction of the Headteacher of the academy in question or Director of ICT, with reference to relevant legislation and where necessary, following advice from the DPO.
- 7.4 Where an allegation has been raised against a member of staff and at the formal request of the Investigating Officer or HR Manager/Advisor, the Director of ICT may provide access to CCTV images as part of the investigation.
- 7.5 The Director of ICT may provide access to CCTV images to Investigating Officers when sought as evidence in relation to allegations of pupil behaviour.
- 7.6 A record of any disclosure made under this policy will be held on the CCTV management system, itemising the date, time, camera, requestor, authoriser and reason for the disclosure.

8. Retention of images

- 8.1 Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV will be retained for no longer than 30 days from the date of recording. Images will be automatically overwritten after this point.

- 8.2 Where an image is required to be held in excess of the retention period referred to in 8.1, the Headteacher or their nominated deputy, will be responsible for authorising such a request.
- 8.3 Images held in excess of their retention period will be reviewed on a three monthly basis and any not required for evidential purposes will be deleted.
- 8.4 Access to retained CCTV images is restricted to the Director of ICT and/or Headteacher of the academy and other persons as required and as authorised by the Director of ICT or Headteacher.

9. Audio Recordings

- 9.1 The Trust may use cameras to record audio as well as images in certain locations where staff and students may feel particularly vulnerable. Such recordings will only be accessed should there be an incident where verbal abuse etc has been alleged. Recordings will not be accessed for the purpose of listening to normal everyday conversations.
- 9.2 Written permission by the Headteacher of the school is required prior to any member of staff accessing the audio recordings.

10. Complaints procedure

- 10.1 Complaints concerning the Trust's use of its CCTV system or the disclosure of CCTV images should be made in writing to the Director of ICT.
- 10.2 All appeals against the decision of the Director of ICT should be made in writing to the CEO.

11. Monitoring Compliance

- 11.1 All staff involved in the operation of the Trust's CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.
- 11.2 All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake data protection training.

12. Policy review

- 12.1 The Trust's usage of CCTV and the content of this policy shall be reviewed annually by the Director of IT with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.