



GREENWOOD ACADEMIES TRUST

Mablethorpe Primary Academy CCTV Policy

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1. Introduction

The purpose of this Policy is to regulate the management, operation and use of the Closed Circuit Television (CCTV) system at Greenwood Academies Trust operated establishments.

The system comprises a number of fixed and dome cameras located around Academy sites. All cameras are monitored from in-school site offices/server rooms and are only available to designated staff – members of the Site Team, a Senior Administrator who is part of the DSL Team and members of the Senior Leadership Team (SLT).

This Policy follows the General Data Protection Regulation (GDPR) 2018 guidelines.

The Policy will be subject to review annually to include consultation as appropriate with interested parties.

2. Objectives of the CCTV Scheme

- To increase personal safety of staff, pupils and visitors and to reduce the fear of crime.
- To protect Trust buildings and their assets.
- To support the Police in a bid to deter and detect crime.
- To assist in identifying, apprehending and prosecuting offenders.
- To protect members of the public and private property.
- To assist in managing each Academy, office and Sports Village under the Trust.

3. Statement of Intent

The CCTV Scheme is registered with the Information Commissioner's Office under the terms of the GDPR 2018 and will seek to comply with the requirements both of the GDPR and the Commissioner's Code of Practice.

Our establishments will treat their system and all information, documents and recordings obtained and used, as data which are protected by the Regulation.

Cameras will be used to monitor activities within Trust buildings and their car parks and other public areas to identify criminal activity actually occurring, anticipated or perceived, and for the purpose of securing the safety and well-being of our establishments, together with their visitors.

Staff have been instructed that static cameras are not to focus on private homes, gardens and/or other areas of private property.

Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals without authorisation being obtained from the Academy Principal and/or the Data Protection Officer (DPO).

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the Police. Recordings will never be released to the media for purposes of entertainment.

The Data Protection Officer must be informed in the first instance before any recording can be released.

The planning and design of each CCTV Scheme has endeavoured to ensure that they will give 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.

Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the Academy CCTV.

4. Operation of the Scheme

The scheme will be administered and managed by either the Academy's Principal or his/her nominee in accordance with the principles and objectives expressed in the Code of Practice.

The in-school day-to-day management will be the responsibility of the Academy Principal or his/her nominee and/or the Site Manager during the day and out of hours and at weekends.

The screen for the CCTV is located in the Academy's main office. It does not show images constantly and images can only be accessed by SLT, IT and the Site Team (including Senior Administrator) when required. Access at this time is regulated by protocols stated below. The CCTV system will be operated 24 hours each day, every day of the year.

5. Control Room/ Main Office

The Academy's Senior Administrator will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.

Access to the CCTV screen images and computer will be strictly limited to SLT, IT and the Site Team.

Unless an immediate response to events is required, staff in the Main Office must not direct cameras at an individual or a specific group of individuals.

Any visitors and other contractors will not enter the Main Office whilst the CCTV images are being viewed unless it is with regard to CCTV maintenance.

Details of all visits and visitors will be recorded on the Academy log-in system.

Visitors must first obtain permission from the Academy Principal or his/her nominee and must be accompanied throughout the visit.

Any visit may be immediately curtailed if prevailing operational requirements make this necessary. If out of hours emergency maintenance arises, the CCTV Operators must be satisfied of the identity and purpose of contractors before allowing entry.

A Visitors' book will be maintained at the Academy's main reception. Full details of visitors including time/date of entry and exit will be recorded.

Other administrative functions will include maintaining video tapes and hard disk space, filing and maintaining occurrence and system maintenance logs.

Emergency procedures will be used in appropriate cases to call the Emergency Services.

6. Liaison

Liaison meetings may be held with all bodies involved in the support of the system.

7. Monitoring Procedures

Camera surveillance may be maintained at all times. A monitor is installed in each system to which pictures will be continuously recorded.

If covert surveillance is planned or has taken place, copies of the authorisation forms, including any review or cancellation, must be returned to the:

The Trust IT Director
Greenwood House
Private Road No 2
Colwick Quays Business Park
Nottingham
NG4 2JY

8. Image Storage Procedures

In order to maintain and preserve the integrity of the disc used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

- i) Each disc must be identified by a unique mark.
- ii) Before using, each disc must be cleaned of any previous recording.
- iii) The Academy's Senior Administrator shall register the date and time of disc insert, including tape reference.
- iv) A disc required for evidential purposes must be sealed, witnessed, signed by the Academy's Senior Administrator, dated and stored in a separate, secure evidence disk store. If a disc is not copied for the Police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed, signed by the controller, dated and returned to the evidence disk store.
- v) If the disc is archived the reference must be noted.

Applications received from outside bodies (e.g. Police, Solicitors) to view or release discs must be referred to the DPO in the first instance. In these circumstances, discs will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a Subject Access Request or in response to a Court Order.

Discs may be viewed by the Police for the prevention and detection of crime, authorised officers of the Local Authority for supervisory purposes and/or authorised demonstration and training.

A record will be maintained of the release of discs to the Police or other authorised applicants.

Viewing of discs by the Police must be recorded in writing and in the log book.

Should a disc be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1 (iv) of this Policy. Discs will only be released to the Police on the clear understanding that the disc remains the property of the Academy and both the disc and information contained on it are to be treated in accordance with this Policy. The Academy also retains the right to refuse permission for the Police to pass to any other person the disc or any part of the information contained thereon. On occasions when a Court requires the release of an original disc, this will be produced from the secure evidence disc store, complete in its sealed bag.

The Police may require the Academy to retain the stored discs for possible use as evidence in the future. Such discs will be properly indexed and properly and securely stored until they are needed by the Police.

9. Breaches of the Policy (including breaches of security)

Any breach of the Trust Policy by Academy staff will be initially investigated by the Principal in order for the appropriate disciplinary action to be taken.

In all instances, the DPO should be informed.

Any serious breach of the Trust Policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

10. Assessment of the Scheme and Trust Policy

Performance monitoring, including random operating checks, may be carried out by the Site Manager or the Academy Principal or his/her nominee.

11. Complaints

Any complaints about the Academy's CCTV system should be addressed to the Principal who should then notify the DPO. Please refer to the Trust Complaints Procedure available on the Academy or main Trust website.

Complaints will be investigated in accordance with Section 9 of this Policy.

12. Access by the Data Subject

The GDPR provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.

All requests for Data Subject Access should be made to the DPO at: dataprotection@greenwoodacademies.org.

13. Public information

A copy of this Policy is available to the public on the Trust website, the Academy website or by request from the main Academy Office.

14. Summary of Key Points

- This Policy will be reviewed every three (3) years.
- The system will not be staffed out of school hours.
- The system is not open to visitors except by prior arrangement and with good reason.
- Liaison meetings may be held with the Police and other bodies.
- Recording discs used will be properly indexed, stored and destroyed after appropriate use.
- Discs may only be viewed by authorised Academy Officers, authorised staff and the Police.
- Discs required as evidence will be properly recorded, witnessed and packaged before copies are released to the Police.
- Discs will not be made available to the media for commercial or entertainment purposes.
- Discs will be disposed of securely by incineration or shredding.
- Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with Trust policies and procedures. The Academy must use and comply with these procedures.
- Any breaches of this Policy will be investigated by the Academy Principal and/or DPO. An independent investigation will be carried out for serious breaches.

- Breaches of the Policy and remedies will be reported to the Academy Principal.