

# Madeley Academy



## CCTV Policy

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## Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Madeley Academy.

The system is comprised of a number of fixed and moveable (PTZ) cameras. All cameras are monitored by Authorised staff. This Code follows Data Protection Act guidelines.

The Code of Practice will be subject to review periodically. The CCTV system is owned by the Academy. All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are aware of their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

## Objectives of the CCTV scheme

- To protect the Academy buildings and their assets
- To increase personal safety and reduce the fear of crime
- 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 the Academy

## Statement of intent

The CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and will comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.

The Academy will treat the system and all information, documents and recordings obtained and used as data which is protected by the Act.

Cameras will be used to monitor activities within the Academy, its grounds and other public areas leading to the Academy entrances to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the Academy, together with its visitors, staff and students.

Static cameras are not to focus on private homes, gardens and other areas of private property. Cameras are sited so they only capture images relevant to the purposes for which they are installed and care is taken to ensure that reasonable privacy expectations are not violated. The Academy will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

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. Recorded footage will never be released to the media for purposes of entertainment.

The planning and design has endeavoured to ensure that the scheme 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 the main access routes to areas covered by the Academy CCTV.

### **Main control office**

Authorised personnel will check the system in the course of their day to day duties.

Access to the CCTV facilities will be strictly limited to SLT and authorised employees of Madeley Academy.

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

When not manned any office with a live connection to the CCTV system must be kept secured.

The Network Manager and Student Support Officers will maintain access logs. The network support team will be responsible for technical support of the system and will maintain relative procedures for its use.

### **Toilet CCTV System**

The CCTV Camera system has been reviewed to ensure that no camera can be used to observe use of urinals or cubicles.

- The Toilet CCTV is not monitored
- Used only for investigation purposes
- All access requests are logged
- Access to the log is restricted to IT Admin, DSL, Behaviour Manager and Data Controller
- Access to the CCTV system is password protected on an individual basis

Viewing of recordings will only be undertaken by 2 members of staff from the same gender as the facilities being viewed.

Students will also have access to accessibility toilets which are not monitored internally.

### **Covert Monitoring**

The Academy may in exceptional circumstances set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or unauthorised action(s), are taking place, or where there are grounds to suspect serious misconduct
- 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 data controller. Covert monitoring must cease following completion of an investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example, toilets.

### **Operation and viewing of recordings**

The scheme will be administered and managed by the SLT, in accordance with the principles and objectives expressed in the code.

The day-to-day management will be the responsibility of the Network Manager. The CCTV system will be operated 24 hours each day, every day of the year.

Authorised personnel (SLT, Security, Student Support Officers and Network Technicians) can view recordings as long as it is for the purposes stated in the objectives for the system. Any viewing of recordings will be recorded on an Access Log and retained for 2 Years.

No student or parents can view recordings without a Subject Access Request and must follow the procedures stated in SAR Policy and specific details set out below. Applications received from outside bodies (eg solicitors) to view or release a device will be referred to the Head Teacher. In these

circumstances storage devices 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. All recorded material must be released in its original format and not modified in any way.

In order to maintain and preserve the integrity of the recording on 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 storage device (eg USB stick, DVD) must be identified by a unique mark
- (ii) Before using, the storage device it must be cleaned of any previous recordings
- (iii) A storage device for evidential purposes must be sealed, witnessed, signed by the Network Manager, dated and stored in a separate, secure area. If a storage device 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 security area
- (iv) If the storage device is archived the reference must be noted.

Storage devices may be viewed by the Police for the prevention and detection of crime. A record will be maintained of the release of the storage device to the Police or other authorised applicants. Forms will be available for this purpose.

Viewing of recordings by the Police must be recorded in writing and in the log book. Should a recording be required as evidence, a copy may be released to the Police on the clear understanding that it remains the property of the Academy, and both the device and the information contained on it are to be treated in accordance with this Code. The Academy also retains the right to refuse permission for the Police to pass to any other person the storage device or any part of the information contained thereon. On occasions when a Court requires the release of an original this will be produced from the secure evidence area, complete in its sealed bag.

The Police may require the Academy to retain the stored device for possible use as evidence in the future.

Such devices will be properly indexed and properly and securely stored until they are needed by the Police.

### **Subject Access Requests (SAR)**

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

All requests should be made in writing to the data controller and follow the procedures for Subject Access Request (available on the website). 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.

As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and the images pixelated so that only the person requesting access can be identified.

The Academy has software that enables images to be pixelated, but if it is not possible to conceal the identity of others, disclosure is unlikely.

Refusal to disclose images, even if pixelated, may be appropriate where its release is:

- Likely to cause substantial and unwarranted damage to an individual
- To prevent automated decisions from being taken in relation to an individual
- Likely to prejudice the legal rights of individuals or jeopardise an ongoing investigation

### Breaches of the code (including breaches of security)

Any breach of the Policy by Academy staff will be initially investigated by a member of SLT under instructions from the Head Teacher, in order for them to take the appropriate disciplinary action.

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

### Complaints

Any complaints about the Academy's CCTV system should follow the current Academy complaints procedures.

Viewing		Incident		Location	Purpose	Staff Member(s)	File Details of any Copies of recording made
Date	Time	Date	Time				

**Recording or Viewing by Third Party (eg Police) Form:**

All data is the property of Madeley Academy

Date of viewing:	
Time of viewing:	
Date and Time of incident:	
Location of Incident	
Evidence of the identification of the third party (Warrant Card/Passport/Driving Licence etc)	
Name of school staff present	
Reason for allowing access request	
Crime incident number (if applicable)	
Location of images	
Name of person authorised to collect images (where appropriate)	
Signature	