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**The Academy is committed to excellent Safeguarding**

**CCTV POLICY**

Policy Date: January 2018 Last updated: March 2021

Date review due: March 2022

Portfolio Group responsible: Premises

Origin: Business Manager



**Introduction**

Under the Protection of Freedoms Act 2012 the processing of personal data captured by CCTV systems (including images identifying individuals) is governed by the Data Protection Act and the Information Commissioner’s Office (ICO) has issued a code of practice on compliance with legal obligations under that Act. The use of CCTV by schools is covered by the Act, regardless of the number of cameras or how sophisticated the equipment is.

This CCTV policy explains how The Ilfracombe Academy will operate its CCTV equipment and comply with the current legislation.

The academy uses CCTV equipment to provide a safer, more secure environment for pupils, staff and visitors. Essentially it is used for:

* The prevention, investigation and detection of crime.
* The apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings)
* Safeguarding pupils, staff and visitors
* Monitoring the security of the site

The academy does not use the CCTV system for covert monitoring.

**Location**

There are 12 cameras located around the external walls of the building and 38 cameras internally, 29 on the corridors, 2 in the library, 1 in the school kitchen, 1 in reception, 3 in Sixth Form and 2 in computer rooms. The academy’s CCTV system is used solely for purpose(s) identified above and is not used to routinely monitor staff conduct. Warning signs, as required by the Code of Practice of the Information Commissioner, will be clearly visible on site. The CCTV system will be operated 24 hours each day, every day of the year. Please see Appendix A for the camera locations.

**Maintenance**

The CCVTV system is maintained by Coomber Security under an annual maintenance contract that includes periodic inspections.

The contractors are responsible for:

* Ensuring the academy complies with its responsibilities in relation to guidance on the location of the cameras
* Ensuring the date and time reference are accurate
* Ensuring that suitable maintenance and servicing is undertaken to ensure that clear images are recorded
* Ensuring that cameras are protected from vandalism in order to ensure that they remain in working order

**Identification**

In areas where CCTV is used the academy will ensure that there are prominent signs placed at the main entrances to the site and inside all external entrances to the building.

The signs will:

* Be clearly visible and readable
* Be an appropriate size depending on context

**Type of equipment**

The academy’s standard cameras record visual images only and do not record sound.

**Administration**

The data controller has responsibility for the control of images and deciding how the CCTV system is used. The academy has notified the Information Commissioner’s Office of both the name of the data controller and the purpose for which the images are used. All operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained in their responsibilities under the CCTV Code of practice. Access to recorded images is restricted to staff that need to have access in order to achieve the purpose of using the equipment. The following members of staff have access to view the cameras, the Business Manager, Head of Sixth Form, IT Technician and the Pastoral Assistants. All access to the medium on which the images are recorded is documented. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images. Under the School’s (Specification and Disposal or Articles) Regulations 2013, academy staff can view CCTV footage in order to make a decision as to whether to search a pupil for an item. If the recorded footage reveals that theft has been committed by a member of staff, this evidence may be used in a disciplinary case. Each member of staff has a log which must be completed each time the cameras are viewed (Appendix B) and any requests must be approved by a member of the Senior Leadership Team. Any outside agencies/contractors in the room at the time of viewing must also sign the log. The CCTV should not be viewed when members of staff are present except for the Senior Leadership Team or students are in the room and it should not be visible through external windows or doors.

**Image storing, viewing and retention**

Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific times and dates to be identified. Access to live images is restricted to the CCTV operator unless the monitor displays a scene which is in plain sight from the monitored location. Recorded images can only be viewed in a restricted area by approved staff. The recorded images are viewed only when there is suspected criminal activity and not for routine monitoring of pupils, staff or visitors unless the camera(s) are install to monitor the safe movement of persons through a designated area e.g. corridors.

The academy reserves the right to use images captured on CCTV where there is activity that the academy cannot be expected to ignore such as criminal activity, potential gross misconduct, or behaviour which puts others at risk. Images retained for evidential purposes will be retained in a locked area accessible by the system administrator only. Where images are retained, the system administrator will ensure the reason for its retention is recorded, where it is kept, any use made of the images and final when it is destroyed. Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the images remains the property of the academy and are to be treated in accordance with Data Protection legislation. The academy also retains the right to refuse permission for the police to pass the images to any other person. On occasions when a court requires the release of a downloaded image this will be produced from the secure evidence store, complete in a sealed bag. Images which the police ask the academy to retain for evidence to be used in the future should be kept in a secure place in a sealed bag. The CCTV system records and retains images on the recorder for 45 days, in the event of a request from a third party in excess of 45 days it will not be possible to obtain CCTV footage unless the incident was retained on a file and locked securely in the Academy safe.

Neither the Data Protection Act nor the Information and Records management Society prescribe any specific minimum or maximum periods which apply to CCTV recorded images. The academy ensures that images are not retained for longer than is necessary. Once the retention period has expired, the images are removed or erased.

**Disclosure**

Disclosure of the recorded images to third parties can only be authorised by the data controller. Disclosure will only be granted:

* If its release is fair to the individuals concerned
* If there is an overriding legal obligation (e.g. information access rights)
* If it is consistent with the purpose for which the system was established

All requests for access or for disclosure are recorded. If access or disclosure is denied, the reason is documented.

NB: Disclosure may be authorised to law enforcement agencies, even if a system was not established to prevent or detect crime, if withholding it would prejudice the prevention of detection of crime.

**Subject access requests**

Individuals whose images are recorded have a right to view images of themselves and, unless they agree otherwise, to be provided with a copy of the images. If the academy receives a request under the Data Protection Act it will comply with requests with 40 calendar days of receiving the request. The academy will make a charge of £10 for the provision of a copy of the images. If the academy receives a request under the Freedom of Information Act it will comply with requests within 20 working days of receiving the request. 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 its disclosure is unlikely as a Freedom of Information request. Those requesting access must provide enough detail to allow the operator to identify that they are the subject of the images, and for the operator to locate the images on the system. Requests for access should be addressed to the data controller.

Refusal to disclose images may be appropriate where its release is:

* Likely to cause substantial and unwarranted damage to that individual
* To prevent automated decisions from being taken in relation to that individual.

**Monitoring and evaluation**

The academy undertakes regular audits to ensure that the use of CCTV continues to be justified. The audit includes a review of:

* Its stated purpose
* The location
* The images recorded
* Storage length
* Deletion

**Reviewing**

This policy will be reviewed every two years by the Premises portfolio group. If the academy decides to change the way in which it uses CCTV, it will inform the Information Commissioner within 28 days.

**Appendix A**

**Cameras**

1. AWP from main entrance
2. 6th form outside fire exit
3. Front entrance
4. Student Services Gate
5. Student Services under walkway
6. View to Art/DT
7. Back of Music
8. Canopy
9. Rear Hall
10. Sports Hall read – GRP enclosure
11. Bottom Court
12. PE Entrance
13. Reception
14. Level C English Corridor

17. C2 Reprographics

19. Com 3

21. Com 4

22. Student Services Entrance

23. C Level Hub

24. D Level Exams Office

25. D Level History

26. D Level HT office Corridor

27. D Level Maths Corridor

28. Library

29. E Level Mr Twomey office

30. E Level Science 4

31. E Level Science 1

32. E Level Languages Corridor

33. Library

34. SCH Stairs

35. Stairs SS C Level

36. Stairs SS C/D Level

37. Stairs SS E Level

38. Back Stairs B/C Level

39. Back Stairs C/D Level

40. Back Stairs E Level

41. HT Office view to study area

42. Music

43. Level B lift/kitchen entrance

44. DT Corridor

45. Art Foyer

46. Art Community Entrance

47. 6th Form Common Room

48. Kitchen Servery

49. PE Entrance Foyer

50. 6th Form Stairs

51. PE Office Corridor

52. Level A PE

53. 6th Form Entrance

54. 6th Form Study Room

**Appendix B**

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