



St Anne's
Church of England Academy

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CCTV POLICY

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1. Introduction

The purpose of this Policy is to regulate the review, management, operation, and use, of closed-circuit television (CCTV) at St Anne's Academy. CCTV is in use to:

- provide a safe and secure environment and increase personal safety of students, staff, and visitors, and for the prevention and detection of crime
- monitor and minimise unauthorised and inappropriate vehicle access
- assist in managing the academy e.g., vandalism, fire alarms, assaults
- protect the academy buildings and their assets
- support the police in a bid to deter and detect crime and identify offenders

This Code follows Data Protection Act guidelines and will be subject to review annually to include consultation as appropriate with interested parties.

2. Supporting Documents

Including but not limited to:

Information Commissioners Office Code of Practice	https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf
The Home Office Surveillance Camera Code of Practice	https://www.gov.uk/government/organisations/surveillance-camera-commissioner
Information Commissioners Office Code – Employment Practices Code	https://ico.org.uk/media/for-organisations/documents/1064/the_employment_practices_code.pdf
Cranmer Education Trust Data Protection Policy	https://www.cranmereducationtrust.com/wp-content/uploads/2019/05/Data-Protection-Policy-July-2018.pdf
Cranmer Education Trust Privacy Notices	https://www.cranmereducationtrust.com/wp-content/uploads/2018/07/Privacy-Notice-for-Pupils.pdf

3. The System

The CCTV system is owned by the academy and comprises 49 fixed cameras located around the academy site, (See Appendix 1A for detailed list). The centralised system is only available to designated staff and members of the Senior Leadership Team as nominated by the Headteacher hereby known as 'Authorised CCTV Personnel.'

4. Statement of Intent

The CCTV Scheme will be reviewed by the Business Manager ensuring it complies with the terms of the Data Protection Act 2018, the General Data Protection Regulation (GDPR) and the Commissioner's Code of Practice. The academy will treat the system and all information, documents and recordings obtained and used as personal information data which are protected by the Act.

Cameras will be used to monitor activities within the academy and its outdoor areas, car park, and other public areas, for the purpose of securing the safety and well-being of the students, staff, and visitors and to identify criminal activity actually occurring, anticipated, or perceived.

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

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. CD images/disks will only be released to the media for use in the investigation of a specific crime and with the

written authority of the police. CD images/disks will never be released to the media for purposes of entertainment.

Planning design and installation 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 all access routes to areas covered by the academy CCTV including entrance gates, car parks and recreational areas.

5. Operation of the System

The Scheme will be administered and managed by the Headteacher's nominees, in accordance with the principles and objectives expressed in the code.

The day-to-day management will be the responsibility of both the Senior Leadership Team (SLT) and the Site Manager during the day and the Site Team out of hours and at weekends.

The CCTV information will only be accessed by SLT members or their authorised nominee or the Site Team.

The CCTV system will be operated 24 hours each day, every day of the year.

6. System, Equipment and Control

The ICT Manager or their nominee will check and confirm the efficiency of the system and in particular that the equipment is properly recording and that cameras are functional.

Access to the CCTV equipment will be strictly limited to the SLT their nominees & the Site & IT Team.

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

Authorised personnel must satisfy themselves over the identity of any visitors to the Office and the purpose of the visit. Where any doubt exists access will be refused.

The system may generate a certain amount of interest. It is vital that operations are managed with the minimum of disruption. Casual visits to view information will not be permitted. Visitors must first obtain permission from the SLT 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 IT or Site Team representative must be satisfied of the identity and purpose of contractors before allowing entry.

A log book will be maintained in the CCTV room. Full details of visitors including time/date of entry and exit will be recorded on 'sign in app' at reception.

Other administrative functions will include maintaining the CCTV equipment hard disc space and system maintenance logs.

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

7. Liaison

Liaison meetings may be held with all bodies involved in the support of the system e.g., police.

8. Monitoring procedures and staff responsibilities

Camera surveillance will be maintained at all times by Chubb.

The secure store in the business admin office has software (ASM200) installed to enable access to and monitoring of CCTV pictures. Images are continuously recorded and stored on the academy computer connected Network Video Recorder (NVR).

The Headteacher, IT team, Site Team and SLT have software access to the secure store PC and software to review and investigate incidents, as necessary.

Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with academy policies and procedures and must be authorised by the Headteacher.

9. Image storage and sharing procedures

The images are stored on an academy CCTV Network Video Recorder, within a locked office in the business administration office, and retained for a period of 30 days after which they are automatically over written. If images are required for evidential purposes, the following procedures for their access, use and retention will be strictly adhered to:

- The images required will be transferred to a disk which will be placed in a sealed envelope, witnessed, signed by Authorised CCTV Personnel, and stored in a separate and secure safe, in the main Administrative Office, until collected.
- Each disk will be identified by a unique reference number.
- The disk used will be new or cleaned of any previous recording.
- If the disk is archived at a later date, the reference number will be noted.
- All disks made will be recorded in the CCTV Log which is maintained by the IT Manager

Disks may be viewed by the Police for the prevention and detection of crime.

A record will be maintained in the CCTV Log of the release of disks to the Police or other authorised applicants.

Viewing of disks by the Police will be recorded in writing and in the logbook. Requests by the Police can only be actioned under Part 3 of the Data Protection Act 2018.

Should a disk be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1 (i) of this Code. Disks will only be released to the Police on the clear understanding that the disk remains the property of the Academy, and both the disk and 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 disk or any part of the information contained thereon. On occasions when a Court requires the release of a disk copied from the CCTV system this will be produced, kept secure, and made available as required.

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

Applications received from outside bodies to view or release disks will be referred to the Headteacher. Requests from e.g., solicitors will normally be met 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.

10. Access by or on behalf of the Data Subject

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate, and their parents, guardians, or authorised carers) with a right to data held about themselves, including those obtained by CCTV.

Requests for Data Subject Access should be made to the Headteacher. In exceptional circumstances still images may be approved and commissioned by the Headteacher and may be provided with the images of

other pupils and adults obscured to prevent identification and inappropriate disclosure of their personal information.

11. Breaches of the Code (including breaches of security)

Any breach of the Code of Practice by academy staff will be investigated by the Headteacher or their nominee and could lead to disciplinary action including dismissal.

Any serious breach of the Code of Practice will be immediately investigated through the Trust, and where appropriate an independent investigation carried out to make recommendations on how to remedy the breach and determine if the ICO should be notified.

12. Assessment of the Scheme and Code of Practice

Performance monitoring, including random operating checks, will be carried out by the Trust Director of Operations.

13. Data Retention

Recordings are made 24x7 and captured on the academy's NVR system where they are retained for 30 days before being overwritten.

14. Public information

Copies of this Code of Practice will be available to the public via the academy website or from the Academy Office or Headteacher.

15. Complaints

Any complaints about the academy's CCTV system should be addressed to the Headteacher.

Complaints may be dealt with using the Trust's Data Protection Policy where they relate to Subject Access Requests.

16. Summary of Key Points

The CCTV system is owned and operated by the academy.

The CCTV Office will not be staffed out of academy hours.

CCTV images may only be viewed by Authorised CCTV Personnel

Students will only be permitted to view CCTV in exceptional circumstances as required and determined by the Headteacher.

The CCTV store is not open to visitors except by prior arrangement and with approval.

Liaison meetings may be held with the Police and other bodies.

Moving images required as evidence will be properly recorded on disk, witnessed, and packaged before copies are released to the police.

To disclose information to the police the academy headteacher needs to be satisfied that the request is genuine, signed off by a police officer of the rank of Inspector or above, and that the information is being required for the prevention or detection of crime, and the prosecutions or apprehension of offenders.

In exceptional circumstances where stills images are authorised and commissioned by the academy and made available to individuals in response to individual requests, they will have other individual's images obscured to protect privacy.

Disks will not be made available to the media for commercial or entertainment use.

Disks will be disposed of securely using the academy's confidential waste arrangements which results in the disks being melted.

Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with academy policies and procedures and be authorised by the Headteacher. The Data Protection Officer provides additional information if required.

Breaches of the code and remedies will be reported to the Headteacher who will, refer serious breaches to the Trust Director of Operations who will in turn work through the Data Protection Officer and consider what is reported to the ICO.

Any breaches of this code will be investigated by the Headteacher. An independent investigation will be carried out for serious breaches and reported to the ICO

Appendix 1A: Log of camera types & locations

Cameras on NVR 1

- 1 English corridor
- 2 Ground floor stairs art /admin
- 3 Art / Drama breakout area
- 4 English corridor
- 5 Y11 Study Area
- 6 Sports Hall corridor towards changing rooms
- 7 Stairs from LRC to English
- 9 Year 11 Study Area
- 10 Admin / MFL breakout area
- 12 Food Technology / Art fire exit stairs
- 13 Humanities linkway corridor
- 14 ICT corridor
- 15 LRC stairs Science
- 16 Heart space near servery
- 17 LRC outside offices]
- 18 1st Aid room breakout area
- 19 Humanities corridor
- 20 Science
- 21 Stairs down from conference room
- 23 Link classroom 2
- 24 Admin / MFL breakout
- 25 Pedestrian gate
- 26 Muga pitch
- 30 Heart space door external
- 31 Art / MFL external
- 32 Bike shed

Cameras on NVR 2

- 1 Reception
- 2 Fire exit next to faith room
- 3 Heart space main entrance internal
- 4 Art / music corridor
- 5 Humanities toilets
- 6 Changing room external doors

- 7 Technology external
- 8 External bin area
- 9 External heart space entrance
- 10 External MFL
- 11 External reception entrance
- 12 Main pedestrian pathway
- 13 External student garden
- 14 Car park disabled bays
- 15 English toilets
- 16 Link classroom 1
- 17 Link corridor
- 19 LRC near SEN
- 20 English corridor
- 21 Technology / Y11 study corridor
- 22 Breakout rear heart space towards admin
- 24 External car park from bike shed
- 25 Reception seating area
- 26 Parent meeting room
- 27 Rear of reception

Cameras on NVR 3

- 1 Heart space
- 2 ICT / Maths toilets
- 3 ICT / maths stairs
- 4 English stairs
- 5 Sandwich servery heart space
- 6 Maths corridor linkway
- 7 English / science stairs
- 8 Technology / art external