

CCTV Systems Policy

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Approved by	OA Central (Deputy Chief Executive)
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Updates/revisions included:	
This is an OA central template, which should be reviewed at a local level and updated accordingly – with the local version returned to OA central for filing.	

1. Introduction

At Olive Academies (OA), we take our responsibility towards the safety of all our staff, visitors, pupils and our extended academy communities very seriously. To help protect everyone’s safety, we use surveillance cameras in our academies to monitor any instances of aggression or physical damage.

The purpose of this policy is to regulate the management, operation and use of the closed-circuit television (CCTV) systems in OA. The systems used in our OA buildings and premises include a number of fixed, dome and remote cameras located around each academy site. The CCTV systems used are owned by OA. All cameras are monitored via access to secure servers and are only available to approved OA staff (authorised users).

This policy should be read alongside the OA Data Protection Policy and OA Privacy Notices. This policy follows Data Protection guidelines and the Information Commissioners Office CCTV code of practice. This is available at: <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

Summary of key points in this policy

- This policy will be reviewed every two years.
- All academy CCTV systems are owned and operated by OA.
- The viewing of images is not open to visitors except by prior arrangement and with good reason.
- CCTV recording media will be used properly, indexed, stored and destroyed after appropriate use.
- CCTV recordings may only be viewed by authorised Olive Academies staff and the police.
- CCTV recording media required as evidence will be properly recorded, witnessed and packaged before copies are released to the police.
- CCTV recordings will not be made available to the media for commercial use or entertainment.
- CCTV recording media no longer required will be disposed of securely by incineration.
- Any breaches of this policy will be investigated by the headteacher. An independent investigation will be carried out for serious breaches.
- Breaches of this policy and remedies will be reported to the academy headteacher and/ or OA Data Protection Officer.

2. Objectives of OA CCTV systems

- To maintain personal safety in each of our academy communities
- To protect OA buildings and property
- 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 OA academies

3. Statement of intent

Any CCTV system in operation in OA premises will be registered with the Information Commissioner under the terms of the Data Protection Act and will seek to comply with the requirements of the Data Protection Act, GDPR and the Commissioner's Code of Practice. OA will treat CCTV systems and all information, documents and recordings obtained and used as data which are protected by the Act.

Cameras will be used to monitor activities within OA academy buildings, car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of each academy community, together with its visitors.

OA staff have been instructed that static cameras are not to focus on private homes, gardens and 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, as set out in the Regulation of Investigatory Power Act 2000.

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 planning and design has endeavoured to ensure that OA CCTV systems 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.

We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded on OA premises. Security cameras are clearly visible and accompanied by prominent signs (as required by the Code of Practice of the Information Commissioner) explaining that CCTV is in use.

Olive Academies does not condone the use of covert surveillance when monitoring OA staff, pupils and/or volunteers. Covert surveillance is any use of surveillance which is intentionally not shared with the subjects it is recording. Subjects are not informed of covert surveillance. Covert surveillance would only be operable in extreme circumstances in line with police protocols and government guidance: <https://www.gov.uk/government/publications/application-for-use-of-directed-surveillance>

4. Operation of the system

Each OA CCTV system will be administered and managed by the academy's headteacher, in accordance with the principles and objectives expressed in this policy.

The day-to-day management will be the responsibility of the academy's Senior Leadership Team (SLT) during the day and the Facilities Team out of hours and at weekends.

The main CCTV system at each academy will be operated 24 hours each day, every day of the year. Recordings are stored on hard drives for 21 days (with the exception of remote cameras) and are wiped at expiry or retained for investigatory purposes if required.

5. System functionality & access

The CCTV System Manager (the facilities manager or in their absence, the academy headteacher) 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 system will be strictly limited to the SLT and the Facilities Team within their designated area of work only.

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

Access to the servers (physically or remotely) is limited to the OA headteacher, SLT or Facilities Manager via unique accounts which are password protected. Server rooms are secured both

during the working day and when not manned.

Other administrative functions will include maintaining recordings and hard disc space, filing and maintaining occurrence and system maintenance logs. Emergency procedures will be used in appropriate cases to call the Emergency Services.

6. CCTV recording/ Video/ CD / DVD procedures

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

- Media required for evidential purposes must be sealed, witnessed, signed by the OA Data Protection Officer or the academy headteacher, dated and stored in a separate, secure, evidence store.
- If media 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 DPO or headteacher, dated and returned to the evidence store.
- Recordings may be viewed by the police for the prevention and detection of crime or for supervisory purposes, authorised demonstration and training.

A record will be maintained of the release of media to the police or other authorised applicants. A CCTV register or log book will be available at each OA academy for this purpose.

Viewing of recordings by the police must be recorded in writing and in the CCTV register or log book. Requests by the police can only be actioned under the Data Protection Act.

Media will only be released to the police on the clear understanding that the media remains the property of OA, and both the media and information contained on it are to be treated in accordance with this policy. OA also retains the right to refuse permission for the police to pass to any other person the media or any part of the information contained thereon. On occasions when a court requires the release of an original recording this will be produced from the secure evidence store, complete in its sealed bag. The police may require OA to retain the stored media for possible use as evidence in the future. Such media will be properly indexed and properly and securely stored until they are needed by the police.

Applications received from outside bodies (e.g. solicitors) to view or release media will be referred to the headteacher and OA Data Protection Officer. In these circumstances the media 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. Should students not related to the incident be visible in footage, steps will be taken to ensure these individuals are not identifiable, e.g. blurred faces in screen shots.

Requests by persons outside OA for viewing or copying disks, or obtaining digital recordings, will be assessed by the academy headteacher and/ or OA Data Protection Officer on a case-by-case basis with close regard to data protection and freedom of information legislation.

The academy headteacher must satisfy themselves over the identity of any visitors who view CCTV images and the purpose of the visit. Where any doubt exists access will be refused. Details of all visits and visitors will be logged and signed off before recordings are viewed. A CCTV register or log book is held at each academy.

Individuals have the right to submit a Subject Access Request to gain access to their personal data in order to verify the lawfulness of the processing. The academy will verify the identity of the person making the request before any information is supplied. A copy of the information will be supplied to the individual free of charge; however, OA may impose a 'reasonable fee' (not exceeding the cost of materials) to comply with requests for further copies of the same information.

All requests will be responded to without delay and at the latest, within one month of receipt. In the event of numerous or complex requests, the period of compliance will be extended by a further two months. The individual will be informed of this extension, and will receive an explanation of why the extension is necessary, within one month of the receipt of the request.

Where a request is manifestly unfounded or excessive, OA holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the ICO and to a judicial remedy, within one month of the refusal.

9. Breaches of the OA CCTV Systems Policy (including breaches of security)

Any breach of this policy by OA staff will be initially investigated by the academy's headteacher, in order for them to take any appropriate disciplinary action.

The OA Data Protection Officer must be notified of any serious breach of this policy. This will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

10. Assessment and monitoring of the OA CCTV Systems Policy

Performance monitoring, including random operating checks, may be carried out by each OA headteacher and the academy's Facilities Manager.

11. Complaints

Any complaints about OA CCTV systems should be addressed to the academy headteacher. Complaints will be investigated in accordance with this policy.

12 Access by the Data Subject

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV. Requests for Data Subject Access should be made to the academy headteacher.

13. Public information

Copies of this policy will be available to the public from each OA academy office, each academy's website and from the academy headteacher.