

CCTV policy

April 2022

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1 Statement of intent

The purpose of this policy is to manage and regulate the use of Closed-Circuit Television (CCTV) systems, how they are operated, who can view the images and the associated stored data.

Our academies CCTV systems design and extent, its general use and management are undertaken at a local level to ensure they provide the required level of cover for each individual situation, however each academy will follow the guiding principles set out within this policy.

The use of CCTV within our academy sites is to ensure that:

- students, staff and members of the public using these facilities are safeguarded
- the facilities are secure
- to deter anti-social or illegal activity on our premises
- aid the police to identify persons if an offence is committed.

2 Operation of the systems

Trust managed academies

The overall approach to the systems will be administered centrally by the Diverse Academies Trust and will be installed and managed in accordance with the principles and objectives expressed in the ICO Code of Practice.

Each CCTV system is registered with the Information Commissioners Office under the terms of the General Data Protection Regulations (GDPR).

The day-to-day management of each system will be the responsibility of each academy Principal, their deputy, Business Managers or other nominated senior member of staff and the Site Managers.

The CCTV systems will be operated 24 hours each day, all year round.

Where systems are capable of recording audio it should be muted as normal practice. Where audio is recorded this should only be for very specific reasons and described in the academy appendix. Including how this data will be used and managed.

PFI academies

Some of our academies are Private Finance Initiatives (PFI), where we operate the academic programme. These sites and facilities are managed by an outsourced facilities management provider.

In these situations, the facilities management providers are responsible for the administration and management of the CCTV systems in accordance with their own policies, all statutory obligations and codes of practice.

As such we work with the facilities management provider and are bound to follow their policies.

A nominated member of the Senior Leadership Team at each site can request access to view information/images in the event of an incident or situation occurring.

3 Protocols

- The CCTV systems are closed digital systems.
- Warning signs have been placed throughout the premises where the CCTV system is active.
- The CCTV system has been designed for maximum effectiveness and efficiency. The academy cannot however guarantee that every incident will be detected or covered and 'blind spots' may exist.
- The CCTV system will not be trained on individuals unless an immediate response to an incident is required.
- The CCTV system will not be trained on private vehicles or property outside the perimeter of the school.
- Access to the system will be strictly limited to those staff already noted.
- Images/recorded data can only be viewed with authorised consent of those staff noted and recorded within the CCTV register.
- All stored data will be kept in a secure locked area or via password protected access to a secure server.
- Recordings will only be released following submission of a formal request as specified below on the authority of the Principal (or facilities management provider for PFI sites), then only to the Police or as required under a Subject Access Request.
- Sites may use visual display screens; these are generally within reception or similar areas to ensure access to the site and main doors are monitored during operational hours. These screens should not be visible to students or members of the public.
- Images will only be retained for as long as they are required. The system will automatically delete recordings after 31 days.
- Be used only for the purposes for which it is intended, including supporting public safety, protection of students, staff and law enforcement.

4 Access by the data subject

Individuals whose personal data is recorded on academy CCTV have a right to make a Subject Access Request to be provided with that information or, if they consent to it, view that information. Information must be provided within the specified ICO timeline of one calendar month upon receiving a request.

Subject Access Requests can be made verbally but personal identification will always be requested and therefore the request submitted in writing, either by letter or emails to the Trust's Data Protection Officer (DPO) at gdpr@diverse-ac.org.uk or to the individual academy office email address is preferred, including the required identification. Each academy will provide the overall coordination to meet the specified timelines of a Subject Access Request, keeping the DPO informed of progress and seeking guidance as required.

Subject Access Requests that are made in writing should include:

- Name of individual.
- Date and time that the request was made.
- Correspondence address.
- Contact number and email address.
- Details of the information requested with specific time periods where applicable.

Footage should only be provided once viewed by the DPO to ensure that it does not contain third party information.

5 Complaints

Any complaints about the CCTV systems should be addressed to the Principal or a senior member of staff of the appropriate academy in the first instance. If the complainant wishes to pursue the matter further the Trust Complaints Policy is available on the Trust website.

Complaints will be investigated in accordance with this policy.

6 Appendix A (for use by each Academy)

ACADEMY NAME:	
ADDRESS:	
Type of installation: External CCTV only/ Internal/External CCTV	
Names of Staff members responsible for and managing all stored CCTV data:	
Name:	Role:
Name:	Role:
Name:	Role:
Location of Cameras: attach a site plan if required	
If audio recording takes place at the academy, please give full details here of the reasons why and confirm where signage is in place to make all stakeholders and visitors aware. Please include how the data recorded will be used and managed:	

Additional Information:

- Requests to release images/recordings must be made in writing stating the approximate date, time and location of the incident. Rationale for the request must be signed by the person requesting the information. Each request must be approved prior to release by the Principal or appointed member of SLT.

Signed by Principal **Date.....**