



# King's Academy Ringmer

“in pursuit of excellence”

## CCTV System Policy

**Date:** Agreed at FG on 30 April 2019

### INTRODUCTION (1)

- 1.1 The purpose of this Policy is to regulate the management, operation and usage of the closed circuit television (CCTV) system at King's Academy Ringmer, hereafter referred to as 'the Academy'.
- 1.2 The system comprises a number of fixed and dome cameras located around the Academy site. All cameras are monitored within the Academy and by the Academy's preferred monitoring employees.
- 1.3 This Code follows Data Protection Act guidelines where reasonably practical.
- 1.4 The Code of Practice will be subject to review periodically, but at least bi-annually, to include consultation as appropriate with interested parties.
- 1.5 The CCTV system is owned by the Academy.

### OBJECTIVES OF THE CCTV SCHEME (2)

- 2.1 (a) To protect the Academy buildings and their assets
- (b) To increase personal safety and reduce the fear of crime
- (c) To support the Police in a bid to deter and detect crime
- (d) To assist in identifying, apprehending and prosecuting offenders
- (e) To protect staff members, students and members of the public using Academy property
- (f) To assist in the management the Academy

### STATEMENT OF INTENT (3)

- 3.1 The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.
- 3.2 The Academy will treat the system and all information, documents and recordings obtained and used as data which is protected by the Act.
- 3.3 Cameras will be used to monitor activities within the Academy and its 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 the Academy, together with its visitors.
- 3.4 Academy staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.
- 3.5 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the police for use in the investigation of a specific crime and with written authority from the Police. Recordings will never be released to the media for purposes of entertainment.

- 3.6 The planning and design has endeavoured to ensure that the System 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.
- 3.7 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.

#### **OPERATION OF THE SYSTEM (4)**

- 4.1 The Scheme will be administered and managed by the Principal, in accordance with the principles and objectives expressed in the code.
- 4.2 The day-to-day management will be the responsibility of the Network Manager, Assistant Network Manager and Premises Manager (hereafter known jointly as the CCTV Controllers).
- 4.3 The CCTV system will be operated 24 hours each day, every day of the year.

#### **ACCESS TO THE SYSTEM (5)**

- 5.1 The Network Manager will be alerted by system email if part of the system is unresponsive, and will take prompt action to remedy the fault.
- 5.2 The CCTV System is web-based and controlled by login and password. Access is restricted to the CCTV Controllers.
- 5.3 Access is only possible from the Academy's domain. No Remote Desktop Access to the System is available.
- 5.4 If out of hours emergency maintenance arises, the CCTV Controllers must be satisfied of the identity and purpose of contractors before allowing entry.
- 5.5 Full details of visitors including time/date of entry and exit will be recorded.
- 5.6 When not manned the System access must be kept logged out.
- 5.7 Emergency procedures will be used in appropriate cases to call the Emergency Services.

#### **LIAISON (6)**

- 6.1 Liaison meetings may be held with all bodies involved in the support of the system.

#### **MONITORING AND STORAGE PROCEDURES (7)**

- 7.1 Camera surveillance may be maintained at all times.
- 7.2 The System is set to record continuously, on a motion- or audio-activated basis. Areas of very frequent legitimate traffic may be excluded from the motion-activation due to demands on storage capacity.
- 8.1 All recordings are deleted automatically after one week, subject to the exceptions in 8.1.1
  - 8.1.1 Recordings can be prevented from automatically deleting, and excerpts from recordings can be downloaded and saved for longer retention, or sent electronically to third parties, or saved to a shared drive for viewing by third parties. The requirements for this to happen are:
    - 8.1.2 Members of the SLT, the Designated Safeguarding Lead (DSL) or Deputy DSL may view recordings or request downloaded recordings from the CCTV Controllers. Any other member of Academy staff wishing to view a recording or request a copy of a recording must do so through the SLT, DSL or Deputy DSL. Recordings downloaded for use within the Academy must be destroyed as soon as they have served their intended purpose. The CCTV Controllers will keep a log of staff who have requested

recordings and both the CCTV Controllers and the staff member concerned will confirm that all copies have been destroyed.

- 8.1.3 Recordings may be viewed by the Police for the prevention and detection of crime.
- 8.1.4 Viewing of recordings by the Police must be recorded in writing and in the log book. Requests by the Police can only be sanctioned under section 29 of the Data Protection Act 1998. <http://www.legislation.gov.uk/ukpga/1998/29>.<sup>1</sup>
- 8.5 Should a recording be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1.2 of this Code. Recordings will only be released to the Police on the clear understanding that the recording remains the property of the Academy, and is to be treated in accordance with this Code. The Academy cannot guarantee that the Police will not pass to any other person the recording or any part of the information contained thereon.
- 8.6 The Police may require the Academy to retain recordings for possible use as evidence in the future. Such recordings will be properly indexed and properly and securely stored until they are needed by the Police.
- 8.7 Applications received from outside bodies (e.g. solicitors) to view or release recordings will be referred to the Principal. In these exceptional circumstances recordings 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.

#### **BREACHES OF THE CODE (including breaches of security) (9)**

- 9.1 Any breach of the Code of Practice by Academy staff will be initially investigated by the Principal in order for them to take the appropriate disciplinary action.
- 9.2 Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach within 30 days.

#### **ASSESSMENT OF THE SCHEME AND CODE OF PRACTICE (10)**

- 10.1 Performance monitoring, including random operating checks, may be requested by the Principal.

#### **COMPLAINTS (11)**

- 11.1 Any complaints about the Academy's CCTV system should be addressed to the Principal.
- 11.2 Complaints will be investigated in accordance with Section 9 of this Code.

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<sup>1</sup> An act to make new provision for the regulation of the processing of information relating to individuals, including obtaining, holding, use and disclosure of such information.

## **ACCESS BY THE DATA SUBJECT (12)**

- 12.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data" relates) with a right to data held about themselves, including those obtained by CCTV.
- 12.2 Requests for Data Subject Access should be made in accordance with the Academy's policy on GDPR Data Subject Access Requests, and the Principal should be notified of requests for CCTV footage. Images should be pixelated or otherwise obscured as necessary so that individuals other than the Data Subject are not identifiable.

## **PUBLIC INFORMATION (13)**

Copies of this policy will be available to the public from the Academy Reception by request.

### **Management of policy**

The Governors and Principal have overall responsibility for the maintenance and operation of this policy. They will maintain a record of concerns raised and the outcomes. King's Academy Ringmer policies will be reviewed regularly and will include an evaluation for impact on workload and working hours.

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The Governing Body Approved this policy on date: **Going to FG on 30 April 2019 for ratification**

Signed:

Chair of Governors