

Appendix 3 – CCTV

Our academies may use Close Circuit Television (“CCTV”) within the premises.

The principles set out below apply to all members of our Workforce, visitors to the Academy premises and all other persons whose images may be captured by the CCTV system.

Purpose of CCTV

Our academies may use CCTV

- to provide a safe and secure environment for pupils, staff and visitors
- to prevent the loss of or damage to buildings and/or assets
- to assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.

Siting of cameras

All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.

Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. We will make all reasonable efforts to ensure that areas outside of the academy premises are not recorded.

Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.

Cameras will not be sited in areas where individual have a heightened expectation of privacy, such as changing rooms or toilets.

Privacy Impact Assessment

Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by the academy to ensure that the proposed installation is compliant with legislation and ICO guidance.

We will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

Management and access

The CCTV system will be managed by a member of the academy leadership team, although it may be operated by other staff on a day-to-day basis. Live and recorded CCTV images will only be viewable by designated individuals and a clear justification established for the accessing of images by any other individuals.

No other individual will have the right to view or access any CCTV images unless in accordance with the guidance below regarding disclosure of images.

The CCTV system will be checked regularly to ensure that it is operating effectively.

Storage and retention of images

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded, and usually not for more than 28 days.

We will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include

- CCTV recording systems being located in restricted access areas
- the CCTV system's being encrypted/password protected
- restriction of the ability to make copies to specified members of staff.

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by the Academy.

Disclosure of images to data subjects

Any individual recorded in any CCTV image is a data subject for the purposes of data protection legislation, and has a right to request access to those images.

Any individual who requests access to images of themselves will be considered to have made a subject access request and this will be dealt with as such.

When such a request is made an academy leader will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The academy leader must take appropriate measures to ensure that the footage is restricted in this way. A permanent copy of such images may be provided if requested.

If the footage contains images of other individuals then we will consider whether

- the request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals
- the other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained
- it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

A record will be kept, and held securely, of all disclosures which sets out

- when the request was made
- the process followed in determining whether the images contained third parties
- the considerations as to whether to allow access to those images
- the individuals that were permitted to view the images and when
- whether a copy of the images was provided, and if so to whom, when and in what format.

Disclosure of images to third parties

We will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with data protection legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

If a request is received from a law enforcement agency for disclosure of CCTV images then academy leaders will follow the same process as above in relation to subject access requests. Detail will be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

The information above must be recorded in relation to any disclosure.

If an order is granted by a Court for disclosure of CCTV images then this must be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

Review of these guidelines and CCTV system

These guidelines will be reviewed in line with the review schedule for the Data Protection policy. The CCTV system and the privacy impact assessment relating to it will be reviewed annually. *Misuse of CCTV systems*

The misuse of CCTV system could constitute a criminal offence.

Any member of staff who misuses CCTV systems or breaches these guidelines may be subject to disciplinary action.

CCTV PRIVACY IMPACT ASSESSMENT TEMPLATE

1. Who will be captured on CCTV?
Students, staff, parents/carers, volunteers, LAC members and other visitors to the academy including members of the public.
2. What personal data will be processed?
Facial images, behaviour and conduct.
3. What are the purposes for operating the CCTV system? Set out the problem that you are seeking to address and why the CCTV is the best solution and the matter cannot be addressed by way of less intrusive means.
Prevention or detection of crime.
4. What is the lawful basis for operating the CCTV system?
Legal Obligation, legitimate interests of the organisation to maintain health and safety and to prevent and investigate crime
5. Who is/are the named person(s) responsible for the operation of the system?
Chris Leach, Office Manager, Nicola Hood Principal
6. Describe the CCTV system, including:
 - a) how this has been chosen to ensure that clear images are produced so that the images can be used for the purpose for which they are obtained;

- b) siting of the cameras and why such locations were chosen;
- c) how cameras have been sited to avoid capturing images which are not necessary for the purposes of the CCTV system;
- d) where signs notifying individuals that CCTV is in operation are located and why those locations were chosen; and
- e) whether the system enables third party data to be redacted, for example via blurring of details of third party individuals.

The CCTV cameras have been chosen to ensure clear images are produced so that they can be used for the purpose for which they were obtained. Cameras have been sited to ensure coverage of key areas both inside and outside of the academy buildings. Cameras face inwards to ensure they do not capture footage off site. Signs are in reception and inside the building to alert anyone to the use of CCTV. The system does not allow for blurring of third party individuals.

7. Set out the details of any sharing with third parties, including processors
CCTV is shared with the Dome Leisure Centre in the common areas as this is a shared facility. Footage will be shared with the Police as appropriate.
8. Set out the retention period of any recordings, including why those periods have been chosen (usually not more than 28 days)
CCTV is not kept for more than 28 days.
9. Set out the security measures in place to ensure that recordings are captured and stored securely
CCTV recordings are stored in a locked office requiring two separate keys with limited key holders.
10. What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?
It is fair to record in the way that we do as the locations and coverage have been carefully considered to avoid an unfair recording. The amount of data is minimised through the short term storage of footage. The risk of the system being accessed unlawfully is limited as a result of the secure location of the system. There is limited risk when data is being shared as this will be done directly and not with the involvement of a third party. Any disc will be password protected.
11. What measures are in place to address the risks identified?
Set out above.
12. Have parents and pupils where appropriate been consulted as to the use of the CCTV system? If so, what views were expressed and how have these been accounted for?
There has been no formal consultation but awareness has been raised through our policies.
13. When will this privacy impact assessment be reviewed? September 2021

Approval:

This assessment was approved by the Data Protection Lead:

DPL Chris Leach

Date 26/08/2020

