

Castle Manor Academy



CCTV POLICY



Date Approved	December 2021
Signed	(Chair of Local Governing Body)
Name	Justine Dawkins
Minuted	December 2021
Date of Next Review	December 2024

1. The purpose of this Policy is to regulate the review, management, operation, and use, of closed circuit television (CCTV) at Castle Manor Academy. CCTV is in use to:
 - increase personal safety of students, staff and visitors, and reduce the fear of crime
 - monitor and minimise unauthorised and inappropriate vehicle access
 - assist in managing the school
 - protect the school buildings and their assets
 - support the Police in a bid to deter and detect crime
 - assist in identifying, apprehending and prosecuting offenders
 - protect members of the public and private property
2. The system comprises 50 fixed cameras.
3. The system does not have sound recording enabled.
4. CCTV warning signs are prominently placed in external places close to school entrances.
5. The CCTV is operated by the school and the deployment of which is determined by the school's leadership team.
6. The CCTV is accessible only by: Vanessa Whitcombe (Head Teacher), Ashley Newman (Estates Manager), Mark Smitheram (Senior Caretaker) Ian Messal (IT Network Manager), Tom Hughes (Assistant Headteacher). James Kennedy (IT Technician) may access the CCTV under the supervision of the Leadership team if any of the other staff who can access are not available.
7. The CCTV footage will only be viewed by the above members of staff and members of Castle Manor's Core Leadership Team.
8. In addition to the 50 fixed cameras we have a camera in each of the three Music practice rooms. These do not record and are monitored by the Music teacher when the rooms are in use. We have six cameras covering S2, S3 and CAD. These are monitored and maintained by the DT/Photography teacher and record. We have one camera in the Photography White room, B27 and the old metal storeroom. These do not record unless record is enabled and are monitored and maintained by the DT/Photography teacher.
9. The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 2018. This policy outlines the school's use of CCTV and how it complies with the Act.
10. The school complies with the Information Commissioner's Office (ICO) code of practice for surveillance cameras and personal information, to ensure it is used responsibly and safeguards both trust and confidence in its continued use. All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images.
11. All operators have read the code of practice for surveillance cameras and personal information issued by the ICO and have signed the authorised users register. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.
12. The data controller, Unity Schools Partnership, has responsibility for the control of images and deciding how the CCTV system is used. The Trust has notified the Information Commissioner's Office of both the name of the data controller and the use of CCTV.
13. The planning and design 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.

14. Cameras are sited so they only capture images relevant to the purposes for which they are installed and care is taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act 2018.
15. The school makes every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.
16. The school may in exceptional circumstances set up covert monitoring. For example:
 - Where there is good cause to suspect that an illegal or unauthorised action(s), are taking place, or where there are grounds to suspect serious misconduct;
 - Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
 - In these circumstances authorisation must be obtained from the data controller
 - Covert monitoring must cease following completion of an investigation.
 - Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example, toilets.
17. Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.
18. All retained data will be stored securely, only the IT Network Manager and Estates Manager can access this.
19. Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act 2018. A request has to be made in writing to the Head Teacher and the school has 30 days in which to reply. The ICO says that data should not be retained for longer than necessary, so the school's CCTV system only holds data for 21 days before it is deleted.
20. As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and the images altered so that only the person requesting access can be identified. The school has software that enables images to be altered, but if it is not possible to conceal the identity of others, disclosure is unlikely. Refusal to disclose images, even if altered, may be appropriate where its release is:
 - Likely to cause substantial and unwarranted damage to an individual.
 - To prevent automated decisions from being taken in relation to an individual.
 - Likely to prejudice the legal rights of individuals or jeopardise an ongoing investigation.
21. There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).
22. Requests for access should be made in writing to the data controller.
23. The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.
24. Complaints and enquiries about the operation of CCTV within the school should be directed to the head teacher at the school. If the issue remains unresolved, complainants should contact the Trust's Data Protection Officer at dpo@unitysp.co.uk. If the issue remains unresolved, and the complainant considers that the school is not operating within the code of practice as issued by the Information Commissioner's Office, they are advised to contact the Information Commissioner's Office via www.ico.org.uk.

