



St. Anne's Church Academy



CCTV Usage Procedure – St Anne's Church Academy (West Wick Campus)

1. Policy statement

- 1.1 The Priory Learning Trust (the Trust) uses closed circuit television (CCTV) and the images produced to prevent or detect crime, to monitor its buildings and grounds in order to provide a safe and secure environment for its students, staff and visitors, to support the effective management of student behaviour, to facilitate the identification of and/or to corroborate the occurrence of, any activity or event which might warrant disciplinary action being taken against students or staff, and to prevent loss or damage to its property.
- 1.2 At St Anne's Church Academy (SACA) West Wick campus the system comprises a number of fixed cameras images from which are transmitted to and stored on a Digital Video Recorder (DVR) which is located in the school office. Access to the system is via password encrypted software which is held on electronic devices nominated by the SACA Academy Business Manager.
- 1.3 Appended to this policy is a plan showing the location of all of the cameras. The system does not have sound recording capability. The system operates 24 hours a day, 365 days a year.
- 1.4 The CCTV system is owned and operated by the Trust, the deployment of which is determined by the Executive under the supervision of the Trust's Data Controller (who is the Chief Analytical Officer- Sarah Gibbon). The day to day operation of the system is managed by the Academy Business Manager at SACA who is supported in the administration of the system by selected members of the Leadership team.
- 1.5 The Trust's CCTV Scheme at SACA is registered with the Information Commissioner under the terms of the General Data Protection Regulation (GDPR). The use of CCTV and the associated images are covered by GDPR. This policy outlines the Trust's use of CCTV at SACA and how it complies with GDPR.
- 1.6 The operation of the system and this policy will be reviewed annually and will include, as appropriate, consultation with interested parties.

2. Statement of Intent

- 2.1 The Trust complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use.
- 2.2 CCTV warning signs are clearly and prominently placed on all three gate entrances to the school.
- 2.3 The original planning, design and installation of CCTV equipment endeavored to ensure that the system will deliver 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.

2.4 Materials or knowledge secured by way of CCTV will not be used for any commercial purpose. Recorded materials will only be released to the media with the written authority of the Police or a Court of Law, typically for use in the investigation of a specific crime.

3. Access

3.1 Access to the system will be strictly limited to selected senior members of the Leadership who will receive appropriate instruction on their legal and organisational responsibilities and the terms of the ICO CCTV Code of Practice.

3.2 Cameras may not be relocated or re-positioned without the agreement of the Academy Business Manager at SACA.

3.3 The Office Crew at West Wick at SACA have access to the images received by the cameras for the purposes of monitoring access to and from the site. This is in real time only; there is no ability to zoom in or out or to focus the direction of the camera or to access historical recordings.

4. Covert Monitoring

4.1 It is not the Trust's policy to conduct 'covert monitoring' unless there are 'exceptional reasons' for doing so.

4.2 The Trust may in exceptional circumstances, determine a sound reason to set up covert monitoring. For example: i) Where there is good cause to suspect criminal activity or malpractice is taking place, or where there are grounds to suspect serious misconduct; ii) 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 Trustees and the School's 'Data Controller' advised before any commencement of such covert monitoring.

4.3 Covert monitoring must cease following completion of an investigation.

4.4 Covert monitoring will not be undertaken for the purposes of assessing an employee's performance at work.

5. Storage and Retention of CCTV images

5.1 Recorded data will be retained on the DVR for 30 days after which it will be automatically overwritten.

5.2 IT Support will, subject to the prior approval of the Academy Business Manager, produce a DVD (or similar extract) of an incident or occurrence. IT Support must maintain a log of all such requests including, the date of the request, the date and time of and a brief description of the images requested, the number of copies produced, and to whom the DVD(s) was/were given. The Academy Business Manager will require that such DVD's are kept in secure storage, whether on or off site, as a condition of their approval.

6. Subject Access Requests (SAR)

- 6.1 The DPA provides that "Data Subjects" (individuals to whom "personal data" relates) with a right to request copies of data held by others about themselves which may include CCTV images.
- 6.2 If the Data Subject is not the focus of the footage i.e. they have not been singled out or had their movements tracked then the images are not classified as "personal data" and the Data Subject/individual is not entitled to the image under the DPA.
- 6.3 All requests should be made in writing to the Data Controller. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
- 6.4 The Trust will respond to requests within 30 calendar days of receiving the written request and any fee. This is in line with GDPR and the ICO CCTV Code of Practice.
- 6.5 There will be no charge for requests, although "reasonable" fees can be charged for manifestly unfounded or excessive requests.
- 6.6 The Trust reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

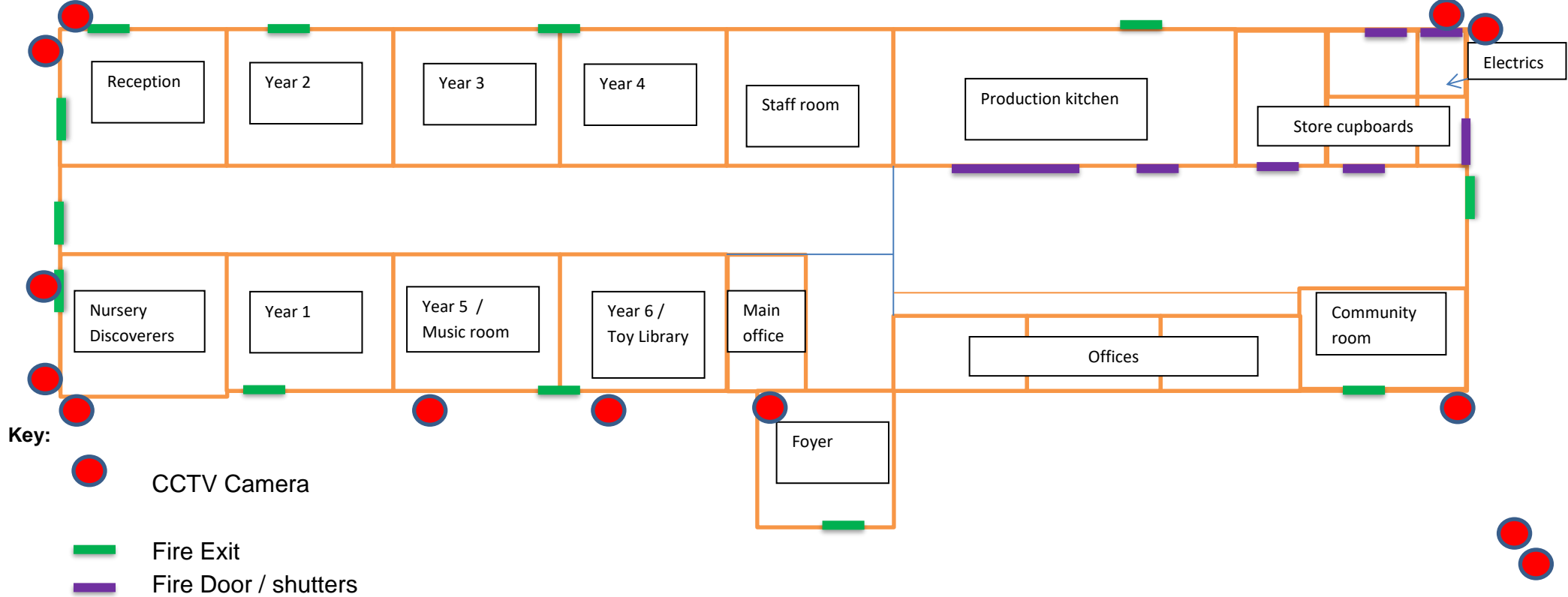
7. Access to and Disclosure of Images to Third Parties

- 7.1 There will be no disclosure of recorded data to third parties other than as required by law and to authorised personnel such as service providers to the Trust where these would reasonably need access to the data (e.g. investigations).
- 7.2 Requests for images / data should be made in writing to the Data Controller.
- 7.3 Images captured via the system may be used for the purposes of the Trust's student behaviour and staff discipline and grievance procedures subject to the terms of this policy and to the confidentiality requirements of those procedures.

8. Complaints

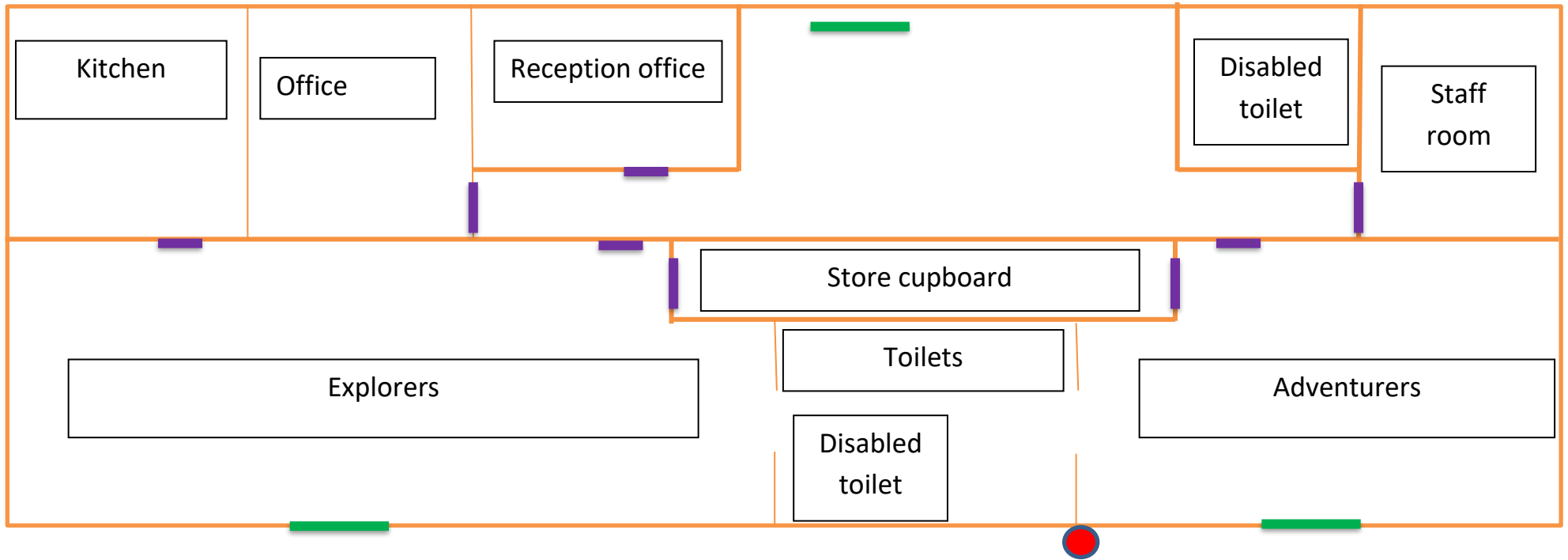
- 8.1 Complaints and enquires about the operation of CCTV within the Trust should be directed to the Data Controller.

SCHOOL MAP SHOWING ALL CCTV CAMERAS @ West Wick



NOT TO SCALE!

Appendix H
SCHOOL MAP SHOWING ALL CCTV CAMERAS @ Little Learners (Adventurers & Explorers)



Key:



CCTV Camera

