



Wykham Park Academy (Banbury) CCTV Policy

Version control			
Date of last update	September 2018	Owner	Wykham Park Academy (Banbury)

Date of last review	January 2017	Review period	
Date of next review		Owner	Banbury Academy
Type of policy		LAB or Board approval	LAB

CCTV Policy

CCTV Policy

Wykham Park Academy (Banbury) CCTV Policy

Date: January 2017

Introduction

The purpose of this Policy is to regulate the review, management, operation, and use, of closed circuit television (CCTV) at Wykham Park Academy (Banbury). CCTV is in use to:

- Increase personal safety of students, staff and visitors, and reduce the fear of crime
- Monitor unauthorised and inappropriate vehicle access
- Assist in managing the Academy
- Protect the Academy buildings and their assets
- Support the Police in a bid to deter and detect crime
- Assist in identifying, apprehending and prosecuting the offenders
- Deter threats to health, safety and welfare of students, staff and other Academy users
- Prevent unacceptable behaviour such as malicious activation of the fire alarm system or bullying and intimidation of students by other students in the areas away from regular staff supervision
- Detect unauthorised entry to the site and buildings

This Code follows the Data Protection Act guidelines and will be subject to review annually to include consultation as appropriate with interested parties.

1. The system

The CCTV system is owned by the Academy and comprises 62 cameras located around the Academy both internally and externally. The cameras are administrated by the Finance and Operations Director. The centralised system is only available to designated Senior Leaders and Management Team or their authorised nominees.

2. Statement of intent

2.1 The CCTV Scheme will be registered annually by the Data Manager with the Information Commissioner under the terms of the Data Protection Act 1998 and will endeavour to comply with the requirements both of the Data

Protection Act and the Commissioner's Code of Practice. Data protection registration number is ZA030525.

- 2.2 The Academy will treat the system and all information, documents and recording obtained and used as data which are protected by the Act.
- 2.3 Cameras will be used to monitor activities within the Academy and its outside areas, car park, and other public areas, for the purpose of securing the safety and wellbeing of the pupils, staff and visitors and to identify criminal activity actually occurring, anticipated, or perceived.
- 2.4 Cameras are not to focus on private homes, gardens or other areas of private property.
- 2.5 Unless an immediate response to events is required, staff must not direct cameras off site at an individual, their property or a specific group of individuals, without an authorisation documented instruction from a member of the Senior Leadership Team or by police instruction endorsed by the Principal for Directed Surveillance, as set out in the Regulation of Investigatory Power Act 2000.
- 2.6 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. CD images/disks will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. CD images/disks will never be released to the media for purposes of entertainment.
- 2.7 Planning design and installation 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.
- 2.8 Warning signs, as required by the Code of Practice of the Information Commissioner have been put in place including entrance gates, car parks and Foyer (See list of notices in Appendix 1A)

3. Operation of the system

- 3.1 The Scheme will be administrated and managed by the Principal's nominee, in accordance with the principles and objectives expressed in the code.
- 3.2 The day-to-day management will be the responsibility of both the Senior Leadership and Management Team (SLMT)
- 3.3 The CCTV information will only be accessed by the SLMT members or their authorised nominee.
- 3.4 The CCTV system will be operated 24 hours each day, every day of the year.

4. System Equipment and Control

- 4.1 The Finance and Operations Director or their nominee will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that the cameras are functional.

- 4.2 Access to the CCTV equipment will be strictly limited to the SLMT and their nominees.
- 4.3 If an out of hours emergency maintenance arises, the Site Team representative must be satisfied of the identity and purpose of contractors before allowing access to the CCTV system.
- 4.4 Other administrative functions will include maintaining the CCTV equipment hard disk space and system maintenance logs.
- 4.5 Emergency procedures will be used in appropriate cases to call the Emergency Services.

5. Liaison

Liaison meetings may be held with all bodies involved in the support of the system e.g. police

6. Monitoring procedures

The CCTV system although continuously in operation is not designed to be monitored at all times, but is to be visited as and when required.

7. Covert recording

7.1 The Academy may only undertake covert recording with the written authorisation of the Principal where:

- Informing the individual(s) concerned that the recording is taking place would seriously prejudice the reason for making the recording;
- There is a good cause to suspect that an illegal or unauthorised action(s) is/are taking place or about to take place.

7.2 Any such monitoring will only be carried out for a limited and reasonable amount of time consistent with the objectives of the monitoring, and only for a specific unauthorised activity. All such occasions will be fully documented showing who made the decision to use covert monitoring and why.

8. Use and disclosure of images

8.1 The monitors/laptops used to access images must be in a secure office and not on view to either students or members of staff. This will ensure that the rights of individuals are retained, and also ensure that the images can be used as evidence if required.

8.2 Access to images by Academy staff is restricted to:

- **The Academy IT staff- for IT support purposes only**
- **The Principal and senior members of staff**
- **Finance and Operations Director**
- **Other members of staff with an involvement in a particular incident ‘with the approval of a senior Manager’**

8.3 All staff given access to images are reminded of the need to keep information confidential

8.4 Access to images will also be made available as necessary to:

- **The police and other law enforcement agencies**
- **The Academy’s solicitors and relevant legal representatives**
- **Government agencies such as Social Services**
- **Members of staff involved with relevant academy disciplinary processes**
- **Other third parties listed in the Academy’s Data Protection Register entry**

8.5 All disclosures of images to third parties are entered in a register to record the date, reasons for disclosure, images disclosed and by and to whom. Images can only be disclosed in accordance with the purposes for which they were originally collected, and in accordance with the Aspirations Academy Trust Notification to the Office of the Information Commissioner.

8.6 Copies of the Academy’s Data Protection Register entry are available on request.

9. Access to individuals

9.1 The Academy recognises the rights of staff, pupils and visitors to the school to make a subject access request for details of personal data held under the Data Protection Act 1998

9.2 Applications should be made in writing to the Principal’s Office. Any application should include the following information:

- The date and time when the relevant images were recorded
- The location of the CCTV camera
- Further information to identify the incident to be viewed, if necessary

The academy will respond promptly and at the latest within 40 days of receiving sufficient information to identify the images requested. If reason for disclosure is denied, the reason will also be recorded.

10. Breaches of the code (including breaches of security)

10.1 Any breach of the Code of Practice by school staff will be investigated by the Principal or their nominee, and could lead to disciplinary action including dismissal.

10.2 Any serious breach of the Code of Practice will be immediately investigated and where appropriate an independent investigation will be carried out to make recommendations on how to remedy the breach.

11. Assessment of the scheme and code of practice

Performance monitoring, including random operating checks, will be carried out by the Finance and Operations Manager.

12. Data Retention

Recordings are made 24x7 and captured on the CCTV hard drive where they are retained for approximately 14 days before being overwritten.

13. Public information

Copies of this Code of Practice will be available to the public via the Principal's Office.

14. Complaints

14.1 Any complaints about the school's CCTV system should be addressed to the Principal who will investigate the matter raised

14.2 Any breaches of this code will be investigated by the Principal

Appendix 1A: CCTV Declaration Notices- Locations

- External Main Entrance
- Stanbridge Reception
- Buttery
- Library
- Wykham Foyer