CCTV Policy

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Contents

Rationale
Under the Protection of Freedoms Act 2012 the processing of personal data captured by CCTV systems (including images identifying individuals) is governed by the Data Protection Act and the Information Commissioner's Office (ICO) has issued a code of practice on compliance with legal obligations under that Act. The use of CCTV by schools is covered by the Act, regardless of the number of cameras or how sophisticated the equipment is.

Objectives and targets
This CCTV policy explains how the Prince Albert Community Trust (PACT) will operate its CCTV equipment and comply with the current legislation.

Action plan
The school uses CCTV equipment to provide a safer, more secure environment for pupils and staff and to prevent bullying, vandalism, and theft. Essentially it is used for:

- The prevention, investigation, and detection of crime.
- The apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings).
- Safeguarding public, pupil, and staff safety.
- Monitoring the security of the site.

Location
Cameras are located in those areas where the school has identified a need and where other solutions are ineffective. The school's CCTV system is used solely for purposes(s) identified above and is not used to routinely monitor staff or pupil conduct.

Maintenance
The CCTV system will have periodic inspections; the contractors are responsible for:

- Ensuring the school complies with its responsibilities in relation to guidance on the location of the camera.
- Ensuring the date and time reference are accurate.
- Ensuring that suitable maintenance and servicing is undertaken to ensure that clear images are recorded.
- Ensuring that cameras are protected from vandalism in order to ensure that they remain in working order.

Identification:
In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

The signs will:

- Be clearly visible and readable.
- Contain details of the organisation operating the scheme, the purpose for using CCTV and who to contact about the scheme.
- Be an appropriate size depending on context.

Type of equipment:
The school's standard CCTV cameras record visual images only and do not record sound.

Administration:
The data controller (Prince Albert Community Trust) has responsibility for the control of images and deciding how the CCTV system is used.

The school has notified the Information Commissioner's Office of both the name of the data controller and the purpose for which the images are used. The school's designated Senior Information Risk Owner is the CEO, Sajid Gulzar.

The PACT will ensure that:

- All operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images.
- Access to recorded images are restricted to designated staff that need to have access to achieve the purpose of using the equipment.

Image storage, viewing and retention:
- Access to live images is restricted to school SLT, ICT team, Site team, in co-ordination with the DPO

- The recorded images are viewed only when there is suspected criminal activity or a safeguarding concern. It is not used for the routine monitoring of pupils, staff or visitors.
- Before any images or footage is downloaded or shared with others, please consult with the Trust DPO and Director for ICT beforehand.
- The school reserves the right to use images captured on CCTV where there is activity that the school cannot be expected to ignore such as criminal activity, potential gross misconduct, or safeguarding concerns which puts others at risk.
- Images retained for evidential purposes will be retained in a locked area accessible by the system administrator only. Where images are retained, the system administrator will ensure the reason for its retention is recorded, where it is kept, any use made of the images and finally when it is destroyed.
- The school ensures that images are not retained for longer than is necessary.

Disclosure:

Disclosure of the recorded images to third parties can only be authorised by the data controller. Disclosure will only be granted:

- If its release is fair to the individuals concerned.
- If there is an overriding legal obligation (eg information access rights).
- If it is consistent with the purpose for which the system was established.

Disclosure may be authorised to law enforcement agencies, even if a system was not established to prevent or detect crime, if withholding it would prejudice the prevention or detection of crime.

Subject access requests:

- Individuals whose images are recorded have a right to view images of themselves and, unless they agree otherwise, to be provided with a copy of the images.
- If the PACT receives a request under the General Data Protection Regulations or The Data Protection Act 2018 they will comply with requests within 30 calendar days of receiving the request.
- If the PACT receives a request under the Freedom of Information Act it will comply with requests within 20 working days of receiving the request.
- 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 its disclosure is unlikely as a Freedom of Information request.
- Those requesting access must provide enough detail to allow the operator to identify that they are the subject of the images, and for the operator to locate the images on the system.
- Requests for access should be addressed to the Trusts Data Protection Officer (dpo@princealbert.bham.sch.uk)

Refusal to disclose images may be appropriate where its release is:

- Likely to cause substantial and unwarranted damage to that individual.
- To prevent automated decisions from being taken in relation to that individual

Review

This policy will be reviewed every 2 years or more regularly in the light of any significant new developments or in response to changes in guidance.