



## CCTV POLICY

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The Basildon Academies Trust uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and to monitor the Academies buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to Academies property.

CCTV surveillance at the Academies is intended for the purposes of:

- protecting the Academies buildings and Academies assets, both during and after Academies hours;
- health and safety of staff, pupils and visitors;
- reducing the incidence of crime and anti-social behavior (including theft and vandalism);
- supporting the Police and other external support agencies to the academies in a bid to deter and detect crime in and around the academies.
- assisting in identifying, apprehending and prosecuting offenders; and
- ensuring that the Academies rules are respected so that the Academies can be properly managed by all

The Academies CCTV system contains a number of fixed cameras and PTZ (electrically moveable).

The CCTV system is owned and operated by the Academies and the deployment of which is determined by the Academies' Senior Leadership Team. The CCTV is a standalone system and operated by the Academies.

The CCTV may be monitored in real time by senior leaders or the academies behavioral teams within closed offices for the monitoring of activity across the academies. CCTV monitoring will be conducted in a manner consistent with all existing policies adopted by the Academies

The Academies complies with Information Commissioner's Office (ICO) CCTV Code of Practice where possible to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

## **Justification for Use of CCTV**

The use of CCTV to control the perimeter of the Academies buildings for security purposes has been deemed to be justified by the leadership team/governors. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation or of anti-social behavior by any.

In other areas of the Academies where CCTV has been installed, e.g. hallways, stairwells, locker areas, entrances and exits to toilets the Academies has demonstrated that there is a proven risk to security and/or health & safety and that the installation of CCTV is proportionate in addressing such issues that may have arisen prior to the installation of the system.

## Location of Cameras

Cameras will be sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated.

The Academies will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. The Academies will make every effort where possible to position cameras so that their coverage is restricted to the Academies premises and the public boundaries to the academies site, which may include outdoor areas.

CCTV will not be used in classrooms unless a shared area such as 'heart spaces' or where risk to any individual is higher than normal to protect all users of the space and this will be pre-approved by the academies senior leaders prior to install.

Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. The Basildon Academies Trust has endeavored to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.

Cameras placed so as to record external areas are positioned in such a way as to prevent or minimize recording another person's private property. Where this isn't possible software cropping has been put in place.

CCTV Video Monitoring and Recording of Public Areas may take place for the following purposes:

**Protection of Academies buildings and property:** The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, office locations, receiving areas for goods/services

**Monitoring of Access Control Systems:** Monitor and record restricted access areas at entrances to buildings and other areas

**Verification of Security Alarms:** Intrusion alarms, exit door controls, external alarms

**Video Patrol of Public Areas:** Parking areas, Main entrance/exit gates, Traffic Control

**Criminal Investigations (carried out by police):** Robbery, burglary and theft surveillance

Cameras are installed on Academies owned facilities & land that are hired by external agencies

## Covert Surveillance

The Basildon Academies Trust will not engage in covert surveillance unless authorized by the academies senior leaders.

## Notification

A copy of this CCTV Policy will be provided on request to staff, students, parents and visitors to the Academies and will be made available on the Academies website.

Adequate signage will also be prominently displayed at the entrance to the Academies property. Signage shall include the name and contact details of the data controller.

Appropriate locations for signage will include:

- at entrances to premises i.e. external doors, Academies gates
- reception area

## **Storage and Retention**

CCTV footage captured by the CCTV system will be retained approx 2 weeks, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue in what case the footage will be exported from the NVR and saved on the academies dedicated CCTV request digital folder

The images/recordings will be stored in a secure environment with a log of access kept by the Academies IT department.

Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Headteacher. The Headteacher may delegate the administration of the CCTV System to another staff member such as the Academies IT department.

In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

Files/Tapes/DVDs will be stored in a secure environment and permissions to said data will be restricted by physical and electrical security.

## **Access**

Access to the CCTV system and stored images will be restricted to authorised personnel only.

A record of the date of any disclosure request, the date and time of the footage along with details of the location of footage of who the information has been provided to (the footage requester)

Requests for footage should be made in writing to the assigned CCTV operators.

Data will be provided to those requests authorised in a permanent format where possible.

In relevant circumstances, CCTV footage may be accessed:

- By the police on a per a request basis to The Basildon Academies Trust and this will be requested in writing from said personnel
- Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on The Basildon Academies Trust's property
- To assist Academies senior leaders in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- To data subjects (or their legal representatives), pursuant to a Subject Access Request or
- To individuals (or their legal representatives) subject to a court order.

- To the Academies insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

## **Subject Access Requests (SAR)**

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

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.

The Academies will respond to requests within 30 calendar days of receiving the request in line with the Academies' right of access policy.

The Academies 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.

A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

In giving a person a copy of their data, the Academies provide a still/series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

Where footage contains images relating to 3<sup>rd</sup> parties, the Academies will take appropriate steps to mask and protect the identities of those individuals where possible.

## **Complaints**

Complaints and enquiries about the operation of CCTV within the Academies should be made inline with the Academies Complaints Policy and Procedures Policy

## **Responsibilities**

The Headteacher (or nominated deputy) will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by The Basildon Academies Trust
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Academies
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at the Basildon Academies Trust is consistent with the highest standards and protections

- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the Academies and be mindful that no such infringement is likely to take place
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighboring residential housing and comply with the principle of “Reasonable Expectation of Privacy”
- Ensure that monitoring footage are stored in a secure place with access by authorised personnel only
- Ensure that camera control is not infringing an individual’s reasonable expectation of privacy in public areas