

CCTV Policy

Reviewed and Updated September 2015

While this policy is non-statutory there is legislation covering data protection which must be adhered to. This policy should be read with reference to Data Protection Act 1998, the protection of Freedoms Act 2012 and the CCTV Code of Practice 2008 from the information Commissioners Office (ICO) available at;

http://www.ico.gov.uk/for_organisations/data_protection/topic_guides/cctv.aspx.

Background

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 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, and Schools should adhere to the ICOs code of practice

1. Introduction

Oasis Academy Coulsdon uses CCTV (closed circuit television images to reduce crime and monitor the building and out buildings in order to increase the security measures we have in place to provide a secure environment for students, staff and visitors and to prevent the loss or damage to the academys property.

The system we use comprises a number of fixed and 'dome' cameras but does not have the capability to record sound. The CCTV system is owned and operated by the Academy, the deployment of which is determined by the senior leadership team. It is monitored centrally.

2. Statement of Intent

The Academy complies with the ICO CCTV code of practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use, the Code of Practice is available to be viewed at;

<https://ico.org.uk/for-organisations/education/>

CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including the school gates as our coverage does extend to the front of the Academy. Whilst the planning and design of the CCTV layout has been set out for maximum effectiveness and efficiency it will not cover all areas or pick up all incidences throughout the Academy. We do not record in sensitive areas such as changing rooms and/or toilets.

3. Citing of the Cameras

In order not to violate reasonable privacy expectations the cameras will only be cited in areas to capture images for which are relevant for the aforementioned reasons (above). We have ensured the location of the cameras does not impeach on the Data Protection Act. Members of staff, students and also visitors will be able to notice cameras as they will be in full view and we endeavour to cover only necessary areas, although these may be internal or external areas of the Academy.

4. Covert Monitoring

There may be exceptional circumstances in which we need to set up covert monitoring;

- i) Where there is a reasonable level of cause to suspect illegal or unauthorised actions are taking place or where there are grounds to suspect serious misconduct
- ii) Where notifying individuals about the monitoring would seriously prejudice the reason for taking the recording.

In any of these circumstances authorisation will be obtained at senior management level, and only in severe cases. Covert Monitoring will cease entirely following the end of an investigation. Covert Monitoring will still not see cameras cited in toilets and/or changing rooms.

5. Storage and retention of images captured by CCTV

All data will be stored securely and no access will be given without express permission from senior leadership. We keep images for a period of ___Days unless an image/s are archived for future evidential use. We will not keep any recorded data for longer than necessary and whilst being stored we shall maintain its integrity in case of need for evidence in the future and to protect the privacy of those recorded in the images.

6. Subject Access Requests (SAR)

Any individual has the right to request copies of CCTV images recorded of themselves under the Data Protection Act. Each request must be made separately in writing to the principal stating; the date, time and location of the footage requested. The Academy has 40 Calendar days to respond and may charge a fee of £10 (maximum) per request. Where any request would jeopardise the legal rights of an individual or jeopardise a potential investigation the school reserves the right to refuse access to CCTV Footage. There will be no disclosure to third parties of recorded data other than to authorised personnel such as the police and/or investigating officers. Requests to this nature will also need to be made, in writing, to the principal.

The data may also be used in line with our discipline and grievance procedures where required, and will be subject to all confidentiality requirements of those policies.

7.Complaints

Complaints and/or enquiries about the CCTV we have in operation should be directed to the Principal in the first instance.

Further information on CCTV and/or its use can be found at;

- CCTV Code of Practice Revised Edition 2008 (published by the Information commissioners Office)
- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998