

# **Anchorsholme Academy**



## **CCTV Policy**

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**Policy statement**

To aid and improve security of buildings and facilities, and for the security and protection of staff, pupils and Anchorsholme Academy equipment.

Common CCTV systems are now based around digital technology and therefore need to be treated as information that will be processed under the general principles of the Data Protection Act 1998. We will be following the CCTV Code of Conduct generated by the Data Protection Commissioner in July 2000 (available via the Information Commissioner's Office).

**Scope and purpose of the policy**

Anchorsholme Academy is committed to ensure that the data will be

- fairly and lawfully processed;
- processed for limited purposes and not in any manner incompatible with those purposes;
- adequate, relevant and not excessive;
- accurate;
- not kept for longer than is necessary;
- processed in accordance with individuals' rights;
- secure;
- not transferred to countries without adequate protection.

The person ultimately responsible for Data Protection within Anchorsholme Academy is the Headteacher. Those with designated management are the nominated Schools' Business Manager and the nominated Schools' Network Manager.

These are:

Graeme Dow, Headteacher  
Kim Percy, Schools' Business Manager  
Darren S. McGinnis, Schools' Network Manager

The purpose of the scheme is to ensure that key areas of the site of Anchorsholme Academy are available for recording and monitoring for training purposes, are kept secure from intrusion, damage or disruption and those within the site of Anchorsholme Academy from intentional or accidental hurt, or for such incidents to be monitored, either in real-time or for subsequent investigation.

Siting of cameras are documented in Appendix II, with a brief summary for requirements for cameras in that location if required.

All relevant stakeholders will be informed of the use and purpose of the site of Anchorsholme Academy by letter, by electronic notification and by signage, where appropriate. All signage will be relevant to the location, including the identity of the Academy, the purpose of the scheme and details of who to contact regarding the scheme, e.g. for a sign with a camera symbol "*This scheme is controlled by Anchorsholme Academy. For further information contact the School Office, 01253 855215*"

All cameras and equipment will require regular maintenance, by ICT Services at Anchorsholme Academy or by third party contactors. Such maintenance will be logged in the maintenance log (Appendix II), including periods of repair, unavailability of equipment and quality of maintenance and / or repair.

## **Confidentially**

The quality of images produced by the equipment will be such that positive matches against any existing member of staff, student, authorised visitor or unauthorised intruder may be made by nominated personnel or legal authorities. This may only be done in accordance with the purpose of the scheme, e.g. legal authorities identifying intruders.

Images will be kept no longer than is necessary. For Anchorsholme Academy this will be approx.17 days' worth of data or unlimited if archived, unless a request has been made for images to be processed or assessed by relevant members of staff or by a legal authority. Such data will be retained only for the period required for any investigation or legal proceedings to take place and be concluded. Images required for evidential purposes will be retained in a secure location. Once the retention period has expired the images will be removed or erased. Should media, on which images have been recorded, be removed for use in legal proceedings the nominated operator will ensure that the following is documented:

1. The date on which the images were removed from the general system for use in legal proceedings.
2. The reason why they were removed from the system.
3. Any crime incident number to which images may be relevant.
4. The location of the images.  
For example – if the images were handed to a police officer for retention, the name and station of that police officer.
5. The signature of the collecting police officer, where appropriate.
6. The reason for the viewing.
7. The names, where appropriate, of those who viewed the images.
8. The outcome of any viewing.
9. The date and time the images were returned to the system or secure location (if they still require retention).

## **Data Protection**

All operators will receive instruction in the Data Protection Principles involved when viewing images, whether monitoring in real-time or recorded images. This includes ensuring that no others shall view images outside of the purposes of the scheme, access to images by those outside of the control of the scheme shall be limited to legitimate reasons associated with the purpose of the scheme. For example – Law enforcement agencies where images recorded would assist in a specific criminal enquiry associated with the Academy, prosecution agencies, relevant legal authorities, the media (where it is decided that the public's assistance is needed in order to assist with the identification of victim, witness or perpetrator in relation to a criminal incident. As part of that decision, the wishes of the victim of an incident should be taken into account). The decision to allow access to those outside of the scheme shall be taken by two members of senior staff, one of which must be either the Headteacher or any of the Schools' nominated managers.

Anchorsholme Academy will not make images more widely available by any media other than those specified above. Third parties with access to images are required to sign a statement to say that they agree to abide by the Academy's published policy and procedures for the use of CCTV images, including forming a contractual obligation if required. All parties will follow the Data Protection Principles at all times.

## **Access Requests**

All operators will receive instruction in the Data Protection Principles involved when viewing images, whether Access by data subjects is a right provided under section 7 of the Data Protection Act 1998. Anchorsholme Academy recognises this right and will follow a standard set of procedures should a request be made upon a completed request form being submitted to the Headteacher or any of the Schools' nominated managers. Any fee charged will be made clear on the request form. Requests will be processed within a specified time period (i.e. 21 days of receiving the required fee and information).

The person making the request must be clearly identified and made known to the operator. This may require the presentation of legal documentation with photographs, e.g. passport or driving licence. Other members of staff may be requested to vouch for the person making the request and this shall be recorded. Individuals will be provided with a form which must be completed, the purposes for the request are recorded and retained. This form, attached as Appendix IV, will be provided at the time that the individual has made a request. Where possible, the information request form should be completed by the person making the request.

The Headteacher, or any of the Schools' nominated managers, will consult with relevant members of staff to determine whether it is appropriate for images of other parties to be disclosed to an individual, and whether any images which include third parties are held in confidence. If third party images are not to be disclosed then the Headteacher or nominated person is to arrange for third party images to be disguised or blurred. If this is completed by a company or third party then a contractual relationship may be required in addition to signing agreement to follow Anchorsholme Academy's policy on use of images.

## Dealing With Access Requests

All requests should be dealt with under the following procedure.

1. All staff involved in operating the equipment must be able to recognise a request from an individual to :
  - a. Prevent processing likely to cause substantial and unwarranted damage to that individual.
  - b. Prevent automated decision taking in relation to an individual.
2. In relation to a request to prevent processing likely to cause substantial and unwarranted damage, the Headteacher's or any of the Schools' nominated managers' response should indicate whether he or she will comply with the request or not.
3. The Headteacher or any of the Schools' nominated managers must provide a written response to the individual with 21 days of receiving the request setting out their decision on the request.
4. If the Headteacher, or any of the Schools' nominated managers, decide that the request will not be complied with, they must set out their reasons in the response to the individual.
5. A copy of the request and the response will be retained for the period specified for all data requests under the Data Protection Policy.
6. If an automated decision is made about an individual, the Headteacher or any of the Schools' nominated managers must notify the individual of that decision.
7. If, within 21 days of that notification, the individual requires, in writing, the decision to be reconsidered, the Headteacher or any of the Schools' nominated managers shall reconsider the automated decision.
8. On receipt of a request to reconsider an automated decision, the Headteacher or any of the Schools' nominated managers shall respond within 21 days setting out the steps that they intend to take to comply with the individual's request.
9. All correspondence dealing with requests, decisions, appeals and subsequent responses shall be documented and retained as per the schedule specified with Anchorsholme Academy Retention Schedule as held in the Freedom of Information Act policy.

## **Policy Awareness**

All staff who may come into contact with images, individuals requesting access to images or third parties requesting information about images will be made aware of this policy, the contents and procedures involved. Nominated operators are recorded in Appendix I and additions or deletions from this list will be made by the Headteacher or any of the Schools' nominated managers. Complaints about any part of this policy or procedures contained within will be dealt with by the Academy's Complaint Procedure. This policy and containing procedures are subject to ratification by the Governing Body and will be reviewed annually. A report on requests, incidents and complaints will be made annually and information made available as per guidance in the Academy's Freedom of Information Act policy.

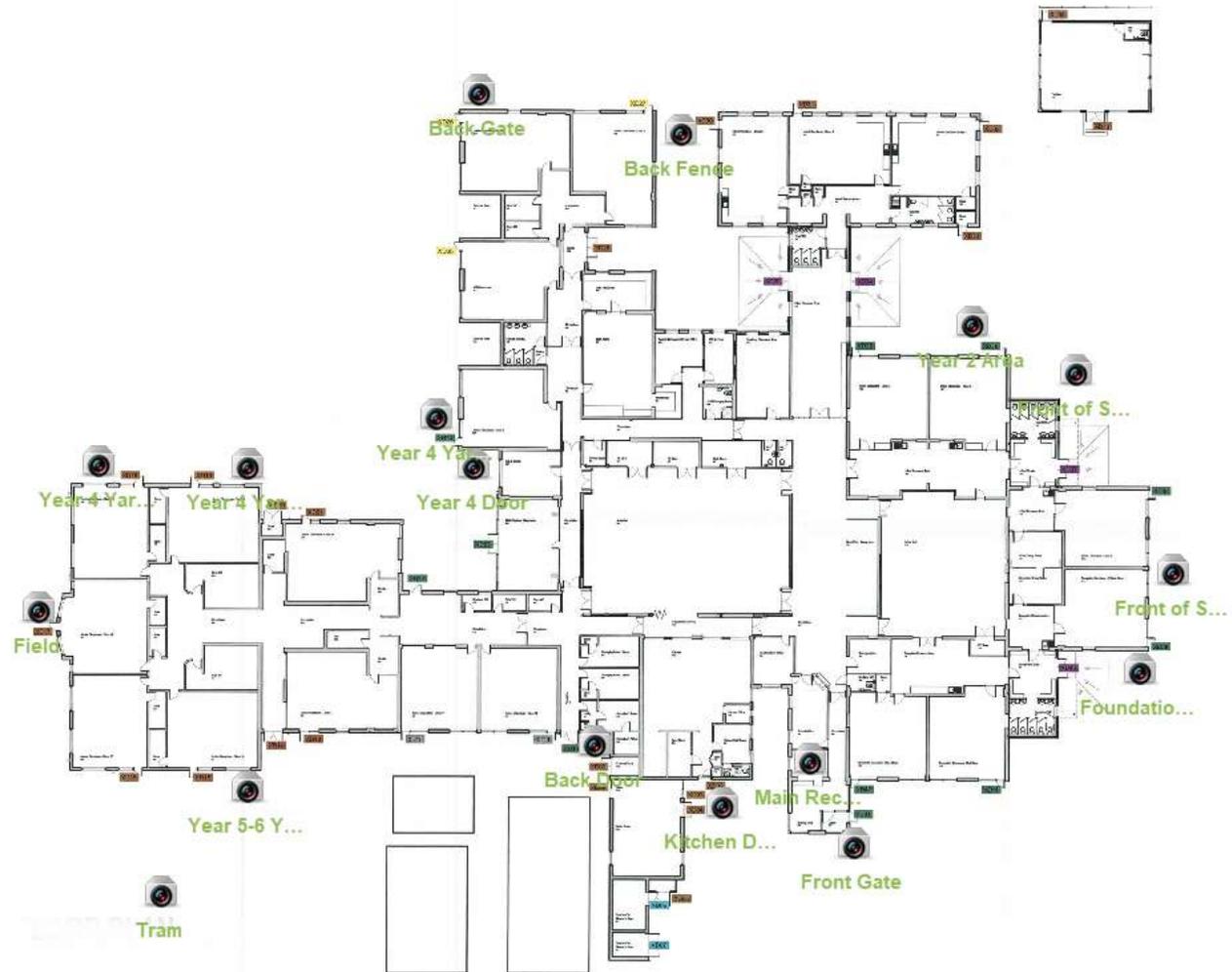
## **Review Of Policy**

This policy is reviewed and amended biennial by Anchorsholme Academy. We will monitor the application and outcomes of this policy to ensure it is working effectively.

## Appendix I - Authorised CCTV Operators

NAME	POSITION	DATE ADDED	DATE REMOVED	NOTES
Graeme Dow	Headteacher	15th November 2017		
Kim Pearcy	Business Manager	15th November 2017		
Mark Buckley	Site Manager	15th November 2017		
Darren S. McGinnis	Network Manager	15th November 2017		
Elaine Bullock	Admin Officer	15 <sup>th</sup> November 2017		Only has access to view the main gate camera.
Dawn Bateson	Admin Officer	15 <sup>th</sup> November 2017		Only has access to view the main gate camera.
Julie Ashworth	Admin Officer	15 <sup>th</sup> November 2017		Only has access to view the main gate camera.
Jeanette Bamber	Admin Officer	15 <sup>th</sup> November 2017		Only has access to view the main gate camera.

## Appendix II – Camera Locations





## Appendix IV – Request For CCTV Images

This form should be used for routine requests for access to view CCTV images by individuals whose images have been captured and/or uniformed police in response to incidents which occurred on the same day e.g. to assist in a specific criminal enquiry, identify a victim, witness or perpetrator in relation to a criminal incident.

This form should **not** be used where the police or other law enforcement agencies request a *copy* of CCTV images. A Section 29 request should be made under the Data Protection Act 1998 for this type of access.

This form should **not** be used where an individual whose image has been recorded requests a *copy* of CCTV images relating to themselves. A subject access request under the Data Protection Act 1998 is required for this type of access.

### To be completed by Applicant

Date	
Person making request	
Organisation	
Reason for request	
Crime reference number	

### To be completed by an Anchorsholme Academy representative

Reason for allowing access/disclosure	
Reason for refusing access/disclosure	

Name & Signature	
Position	
Date	