



# WELLSPRING

ACADEMY TRUST

We Make A Difference

## CCTV Policy

Updated: September 2019 and Ratified 17<sup>th</sup> October 2019

SPRINGWELL LEARNING COMMUNITY -  
LINCOLNSHIRE



## **Introduction**

This document regulates and guides the management, operation and use of the closed circuit television (CCTV) systems installed at Academy sites.

The system/s comprises a number of cameras located around the Academy site/s. No cameras are actively monitored but can be accessed for review purposes from reception office/s. No monitors will be positioned where persons other than those authorised can view them.

This document follows Data Protection Act guidelines and will be subject to review to include consultation as appropriate with interested parties. A review of this document will be conducted in the event of significant changes to the CCTV - system or an incident involving CCTV.

The CCTV system is owned by the Academy site/s and is maintained by the Mars group Ltd.

This document will be subject to ratification and review by the Governing Body on an annual basis.

This document applies to Academy staff, and those who attend and support the Academy on a voluntary basis.

## **Objectives of the CCTV scheme**

- To increase personal safety and wellbeing of all Academy users and reduce the likelihood of crime
- To protect the Academy buildings and assets
- To support the Police in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders
- To assist in managing the Academy
- To reduce acts of violence and /or/ bullying type behaviors

### **Statement of intent**

The CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice. The Academy will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.

Cameras will monitor activity within the Academy and grounds to identify criminal activity and secure the safety of all Academy users and visitors. Any recordings made may be viewed and used by authorised persons in support of the Academies Child Protection Policy.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Material will never be released to the media for purposes of entertainment.

It is not possible to guarantee that the system will detect every single incident. Warning signs, as required by the Code of Practice of the Information Commissioner, have been placed strategically around the Academy site.

### **Operation of the system**

Administration and management of the system is the responsibility of the (Executive) Principal.

The day-to-day management will be the responsibility of the (INSERT HERE WHO) E.g. the Site Manager.

The CCTV system will be operated 24 hours each day, every day of the year.

### **(INSERT HERE) E.g. Control Room / Reception Office and (Executive) Principals Office**

- The (INSERT HERE WHO) will check the operation of the system daily.
- Only authorised personnel will have access to the control room.
- Full details of visitors will be recorded.
- When not manned access to CCTV must be kept secure.

### **Monitoring procedures**

- Camera surveillance will be maintained at all times.
- A monitor is installed in the **(INSERT HERE)** E.g. Reception office and can display pictures on a continuous feed.
- Images are stored on the hard drive for 14 days before being automatically deleted.
- Authorisation forms will be in place for any covert surveillance, including any reviews.

### **Recording procedures**

To preserve data integrity, the Trust must be consulted following all requests from external agents for access to images. The Trust will advise the appropriate action.

### **Breaches of the code (including breaches of security)**

Any breach of the Code of Practice by Academy users will be initially investigated by the (Executive) Principal, allowing him/her to take action. Any serious breach of the Code of Practice will be immediately investigated with reference to the Trusts Disciplinary Policy and an independent investigation, agreed in consultation with the Chair of Governors, carried out to make recommendations on how to remedy the breach.

Where the (Executive) Principal is in breach, the Chair of Governors will direct any investigation. The Chair of Governors will be notified of all breaches.

### **Assessment of the scheme and code of practice**

The site maintenance staff E.g. a Site Manager / Caretaker will carry out performance monitoring, including random operating checks as agreed / instructed by the (Executive) Principal.

### **Complaints**

Any complaints about the Academies CCTV system should be addressed to the (Executive) Principal. Complaints will be investigated in accordance with breaches of the code as above.

In the event that the complaint is not resolved the complainant will be referred to the Information Commissioner's Office.

### **Access by the Data Subject**

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV. Requests for Data Subject Access should be made in writing to the (Executive Principal). Any such requests for access to CCTV images should include:

- The date and time when the images were recorded;
- The location of the CCTV camera;
- Further information to identify the individual, if necessary

Section 7 of the Data Protection Act 1998 gives individuals a general right of access (the Subject Access Right) to any 'personal data' held about them by organisations. Consider these two points when deciding whether a person is entitled to view their image.

1. Is the camera covered by the Data Protection Act e.g. can the camera move?

If the answer to this question is NO, then the individual is not entitled to the image under the provisions of 'Subject Access'. If the answer is YES, then go to question 2.

2. Is the individual the focus of the image e.g. have they been singled out in any way and/or their movements followed?

If the answer to this question is NO, then the person's image is not classed as 'personal data' and therefore, the individual is not entitled to the image under the provisions of Subject Access - Data Protection Act 1998. If the answer is YES, then the image is dis-closable to them.

Please note, that individuals may still be able to request a copy of the CCTV footage under other legislation or as required for civil purposes. When this is the case, legal advice must be sought before a disclosure is made (to either a solicitor or the individual and the Trust must be consulted with in the first instance).

### **Public information**

Copies of this policy and guidance document may be available to the public. Where an Academy receives a

request the Trust should first be consulted to establish how such documentation is to be used and by who.

### **Summary of Key Points**

The Governing Body with responsibility for Premises matters will review this Policy and guidance document on an annual basis.

- The CCTV system is owned and operated by the Academy.
- Liaison meetings may be held with the Police and other bodies, following liaison with the Trust.
- Recorded footage will be used properly indexed, stored and destroyed after appropriate use.
- Footage required as evidence will be properly recorded, witnessed and packaged before copies are released to the police.
- Footage will not be made available to the media for commercial or entertainment purposes.
- Any breaches of this policy will be investigated by the (Executive) Principal. An independent investigation will be carried out for serious breaches.
- Breaches of this document and remedies will be reported to the (Executive) Principal and Chair of Governors.

Signed

(Executive) Principal

Chair of Governors

Date:

**Wellspring Academy Trust**

**CCTV Viewing and Recording**  
**Log**

<b>DATE</b>	<b>CAMERA/sViewed</b>	<b>TIME Viewed</b>	<b>REASON</b>	<b>OPERATOR</b>	<b>VIEWING OR RECORDING REQUESTED BY</b>	<b>REF NO</b>