



THE  
DE LA SALLE  
ACADEMY

**CCTV POLICY**

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1	DPO	May 2018	May 2018		Review 2020
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# The De La Salle Academy CCTV Policy

## 1. Introduction

- 1.1 The purpose of this Policy is to regulate the review, management, operation, and use, of closed circuit television (CCTV) at The De La Salle Academy. CCTV is in use to:
  - increase personal safety of students, staff and visitors, and reduce the fear of crime
  - monitor and minimise unauthorised and inappropriate vehicle access
  - assist in managing the Academy
  - protect the Academy buildings and their assets
  - support the Police in a bid to deter and detect crime
  - assist in identifying, apprehending and prosecuting offenders / protect members of the public and private property
- 1.2 The system comprises of a number of fixed dome cameras.
- 1.3 The system does not have sound recording enabled.
- 1.4 The CCTV system is part of the electronic infrastructure of the building and is operated by the Academy and the deployment of which is determined by the Academy's leadership team.
- 1.5 The CCTV is accessible only by certain key staff with responsibility for security or behaviour.
- 1.6 Any changes CCTV monitoring will be subject to consultation with staff and the Academy community.
- 1.7 The Academy's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 1998. This policy outlines the Academy's use of CCTV and how it complies with the Act.
- 1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are trained by the Academy data controller in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.
- 1.9 The Academy's leadership team has responsibility for the control of images and deciding how the CCTV system is used. The academy has notified the Information Commissioner's Office of both the name of the data controller and the purpose for which the images are used.

## 2. Statement of Intent

- 2.1 The Academy complies with Information Commissioner's Office (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 published and for Subject Access Requests on the Academy website in the GDPR section.
- 2.2 CCTV warning signs are prominently placed in external places close to Academy entrances.
- 2.3 The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

## 3. Siting the Cameras

- 3.1 Cameras are sited so they only capture images relevant to the purposes for which they are installed and care is taken to ensure that reasonable privacy expectations are not violated. The Academy will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

- 3.2 The Academy makes every effort to position cameras so that their coverage is restricted to the Academy premises, which may include outdoor areas.
- 3.3 CCTV is not used in standard classrooms. Cameras are positioned however, in the recording studio, ICT rooms and in the Academy technology workshops, as these are high value locations and likely to be the focus of out of hours crime.
- 3.4 Members of staff have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

#### **4. Covert Monitoring**

- 4.1 The Academy may in exceptional circumstances set up covert monitoring. For example:
  - i. Where there is good cause to suspect that an illegal or unauthorised action(s), are taking place, or where there are grounds to suspect serious misconduct;
  - ii. Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- 4.2 In these circumstances authorisation must be obtained from the data controller.
- 4.3 Covert monitoring must cease following completion of an investigation.
- 4.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example, toilets.

#### **5. Storage and Retention of CCTV images**

- 5.1 Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.
- 5.2 All retained data will be stored securely.

#### **6. Access to CCTV images**

- 6.1 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

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

- 7.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- 7.2 All requests should be made to the data controller. 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.
- 7.3 The Academy will respond to requests within month of receiving the request.
- 7.4 A fee may be charged for a request.
- 7.5 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 the images pixelated so that only the person requesting access can be identified. The Academy has software that enables images to be pixelated, but if it is not possible to conceal the identity of others, disclosure is unlikely. Refusal to disclose images, even if pixelated, may be appropriate where its release is:
  - Likely to cause substantial and unwarranted damage to an individual.
  - To prevent automated decisions from being taken in relation to an individual.
  - Likely to prejudice the legal rights of individuals or jeopardise an ongoing investigation.

## 8. **Access to and Disclosure of Images to Third Parties**

- 8.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the Academy where these would reasonably need access to the data (e.g. investigators).
- 8.2 Requests for access should be made in to the data controller.
- 8.3 The data may be used within the Academy's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

## 9. **Complaints**

- 9.1 Complaints and enquiries about the operation of CCTV within the Academy should be directed to the principal at the Academy.
- 9.2 If the issue remains unresolved, complainants should contact the Trust's Data Controller using the Academy address or via email at: [dpo@de-la-salle.co.uk](mailto:dpo@de-la-salle.co.uk).
- 9.3 If the issue remains unresolved, and the complainant considers that the Academy is not operating within the Code of Practice as issued by the Information Commissioners Office, they are advised to contact the Information Commissioners Office via [www.ico.org.uk](http://www.ico.org.uk).

### **Further Information**

- Further information on CCTV and its use is available from the following:
- CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)
- [www.ico.org.uk](http://www.ico.org.uk)
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998

### **Appendix A – CCTV Signage**

It is a requirement of the Data Protection Act 1998 to notify people entering a CCTV protected area that it is monitored by CCTV and that pictures are recorded. The Academy is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The contact email address for enquiries