



Granville Academy

Part of the de Ferrers Trust



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Principal: Mrs J Kingswood. B.Ed.(Hons). MA. NPOH

Our Mission Statement

Granville Academy is committed to:

- Raising standards of achievement and creating opportunities for all students, regardless of needs to develop their full potential and improve their life chances
- Raising the aspirations of the whole academy community by creating a culture of continuous learning that celebrates success at all levels
- Developing a academy that is the pride of the local area where students, parents, staff, governors and wider community feel safe, valued, listened to and welcomed for the diverse contribution they make to our academy life

CCTV policy

Co-ordinator: Jo Kingswood (Principal)

Start date: April 2017

Review date: April 2019

Linked to: Data Protection Policy, Freedom of Information

Introduction

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Granville Academy, hereafter referred to as "the academy".

The system comprises a number of static cameras located around the academy site. All cameras are monitored from the main academy office or by other select users (Network Manager, Business Manager, Senior Management, and House Leaders). The system is owned and operated by the academy. Changes to CCTV monitoring at the academy will be subject to consultation with staff and the academy community.

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 (Appendix A). This policy outlines the academy's use of CCTV and how it complies with the Act.

All 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's Network Manager 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.

Objectives of the CCTV system

The CCTV system is installed for the following reasons:

- to increase personal safety for staff, students and visitors to the site;
- to protect the academy buildings and assets within those buildings;
- to assist in identifying, apprehending and prosecuting offenders;
- to protect private property;
- to assist staff in managing the academy.

An annual review is conducted of the system using the checklist (Appendix B). Following this review, the policy will be updated as required but otherwise will be reviewed bi-annually.

Statement of Intent

The academy complies with the 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 at:

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

CCTV warning signs will be clearly and prominently placed at around academy. Signs will contain details of the purpose for using CCTV (see Appendix C). In areas where CCTV is used, the academy will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

The CCTV system has been designed to ensure that the scheme will give maximum effectiveness and efficiency. However, we acknowledge that it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Siting the cameras

Cameras will be sited so that they only capture images relevant to the purposes for which they are installed (described above) and care will be 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.

The academy will make every effort to position cameras so that their coverage is restricted to the academy premises, which may include outdoor areas.

CCTV will not be used in classrooms with the exception of the Seclusion / Inclusion Room.

Where necessary, privacy masks will be applied to ensure the privacy of neighbouring properties.

Covert monitoring

The academy may in exceptional circumstances set up covert monitoring. For example:

- where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct

Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording. In these circumstances, authorisation must be obtained from the Principal. Covert monitoring must cease following completion of an investigation. Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example staff offices, toilets or changing rooms.

Storage and retention of CCTV images

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. All retained data will be stored securely.

Subject access requests (SAR)

Individuals have the right to request access to CCTV footage relating to them under the Data Protection Act. All requests should be made in writing to the Principal. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, we would expect the date, time and location. The academy will respond to requests within 40 calendar days of receiving the written request.

The academy reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

Access to, and disclosure of, images to third parties

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).

Requests should be made in writing to the Principal.

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.

Complaints

Complaints and enquiries about the operation of CCTV within the academy should be directed to the Principal in the first instance.

Appendix A – Data Protection Act

The Data Protection Act 1998: Data Protection Principles

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless:
 - (a) at least one of the conditions in Schedule 2 is met, and
 - (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

This is not a full explanation of the principles, for further information refer to the Data Protection Act.

Appendix B – Checklist

This CCTV system and the images produced by it are controlled by Mr Andrew Dickson (Network Manager) who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998).

Granville Academy has considered the need for using CCTV and has decided it is required for security, safety and good management of the Academy. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	March 2017	ADI	March 2018
There is a named individual who is responsible for the operation of the system. (Mr Andrew Dickson)	March 2017	ADI	March 2018
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	March 2017	ADI	March 2018
Cameras have been sited so that they provide clear images.	March 2017	ADI	March 2018
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	March 2017	ADI	March 2018
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	March 2017	ADI	March 2018
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them. (Network Manager, Business Manager, Senior Management, and House Leaders)	March 2017	ADI	March 2018
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.	March 2017	ADI	March 2018
Except for law enforcement bodies, images will not be provided to third parties.	March 2017	ADI	March 2018
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.	March 2017	ADI	March 2018
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	March 2017	ADI	frequently

Appendix C – CCTV signage

It is a requirement of the Data Protection Act 1998 to notify people entering a CCTV protected area that the area 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

Signed  Jo Kingswood (Head)

Signed..... David Gaskin (Chair of Governing Board)