



# CCTV Procedures

## June 2019

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## 1. Introduction

The purpose of these procedures is to provide assistance in the operation, management and regulation of the CCTV systems in place at the academies within the Trust.

This document is subordinate to our GDPR Policy, and operates within the context of that policy.

CCTV systems within the Trust are owned and operated as follows:

Academy	Owned By	Operated By
Erdington Hall	Erdington Hall	Erdington Hall
Oaklands	Oaklands	Oaklands
Pegasus	Pegasus	Pegasus
Yarnfield	Engie / BSP Ltd	Engie / Yarnfield
Cockshut Hill	Birmingham Schools Partnership Ltd	Cockshut Hill
Lyndon	Lyndon	Lyndon
Ninestiles, an Academy	Ninestiles, an Academy	Ninestiles, an Academy
Sixth Form College, Solihull	Sixth Form College, Solihull	Octaga

These procedures follow the ICO's Code of Practice for Surveillance Cameras and Personal Data, the Data Protection Act 2018, the Freedom of Information Act 2012, the Equality Act 2010, the Regulation of Investigatory Power Act 2000, our GDPR Policy and the academies' Privacy Notices.

We have considered the privacy issues involved with using surveillance systems and have concluded that their use is necessary and proportionate to the needs we have identified.

## 2. Objectives of the CCTV Scheme

In each academy, the CCTV system aims to:

- protect the academy's buildings and assets, both during and after operating hours;
- increase the personal safety of staff, pupils and visitors;
- reduce the risk of bullying;
- reduce the incidence of crime and anti-social behaviour;
- support the Police in efforts to deter and detect crime;
- assist in identifying, apprehending and prosecuting offenders;
- protect members of the public; and
- ensure the academy's rules are respected so that the academy can be properly managed.

In line with those aims, any information captured by our CCTV systems is processed in performance of tasks carried out in the public interest. Any special category data is processed for reasons of substantial public interest.

The CCTV system is not intended for the following purposes, which are prohibited:

- covert surveillance, unless it is at the written request of a law enforcement agency with the appropriate authority;
- monitoring individuals based upon their protected characteristics as specified by the Equality Act 2010; or
- any other purpose which is not consistent with the stated aims.

### 3. Roles and Responsibilities

#### *Summit Learning Trust*

Summit Learning Trust is the data controller for all data captured by its academies' CCTV systems. The Trust Office is responsible for:

- proposing, amending and maintaining these CCTV procedures, in consultation with appropriate stakeholders and within the limits of our GDPR Policy and relevant legislation;
- maintaining Privacy Notices, which will include explicit references to the CCTV systems where appropriate;
- maintaining a Retention Schedule, which will include explicit references to information recorded by the CCTV systems; and
- providing operational advice and support to the academies on the administration of these procedures, and on data protection issues more generally.

#### *The Data Protection Officer (DPO)*

The DPO, who is named within our GDPR Policy, is responsible for:

- independently monitoring compliance with these CCTV procedures;
- coordinating any data protection impact assessments, as appropriate;
- reporting any findings and recommendations to the Trust Office for consideration; and
- providing operational and strategic advice and support on data protection issues.

#### *The Principals*

The Principal for each academy is responsible for:

- day-to-day leadership on data protection issues within the academy;
- ensuring routine performance monitoring, including random operating checks, takes place;
- supervising access to, and administration of, the CCTV system;
- ensuring staff receive appropriate and regular training on data protection;
- delegating operational duties within the academy as appropriate; and
- appointing the Authorised Operator.

#### *The Authorised Operators*

The Authorised Operator for each academy is responsible for:

- the day-to-day administration of the CCTV system, in accordance with these procedures;
- regulating access to CCTV control areas, by satisfying themselves about the identity of the visitor(s) and the purpose of the visit(s) before any access is permitted;
- ensuring CCTV control areas are kept secure;
- maintaining logs to record who accesses the system and its recordings, and when;
- applying the retention policy to ensure information captured by the system is not stored longer than necessary.

## The Business Managers

The Business Manager for each academy is responsible for:

- investigating any suspected data breaches relating to the CCTV system, unless there is a conflict of interest in doing so;
- coordinating responses to subject access requests and freedom of information requests relating to information captured by the CCTV system, unless there is a conflict of interest in doing so; and
- maintaining a record of all data protection training which has been completed by the Authorised Operators.

In the event that such a conflict of interest is identified, the Principal will nominate an alternative person to perform these duties on a case-by-case basis. These duties will be performed in accordance with our GDPR Policy.

## 4. Operation of the System

The CCTV systems within the Trust are implemented as follows:

Academy	Number of Cameras	Controlled From
Erdington Hall	22	Principal's Office
Oaklands	16	Back Office
Pegasus	4	Main Office
Yarnfield	6	Main Office
Cockshut Hill	69	IT Manager's Office
Lyndon	90	Multiple rooms
Ninestiles, an Academy	145	Multiple rooms
Sixth Form College, Solihull	70	Restricted network access

These systems will be operated 24 hours per day for every day of the year.

The location of cameras is a key consideration in ensuring the CCTV scheme meets its objectives while minimising risks to individuals' privacy. Each academy will consider the following criteria when selecting locations for any additional cameras for installation:

- Spaces that do not have relevance to the scheme's purposes will be avoided where possible. This consideration should be given particular weight for spaces which are not part of the academy's premises (such as public pavements or neighbouring property).
- Cameras should be sited to ensure they can produce images of the right quality, taking into account their technical capabilities and the environment in which they are placed.
- Cameras should be suitable for the location, bearing in mind the light levels and the size of the area to be viewed by each camera.
- Cameras should be positioned so they produce images of a consistent quality throughout the year (such that they are not obscured by plant growth during spring, for example).
- Cameras should be sited so they are secure and protected from vandalism.

Unless an immediate response is required, staff must not direct cameras at an individual, their property, or a specific group of individuals without an authorization being obtained for directed surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.

## 5. Notification

Each academy will notify individuals that CCTV is in use by installing and maintaining signage at entrances to the academy's premises. Signage will:

- be clearly visible and readable;
- contain details of the organisation operating the system and who to contact about the scheme (where these things are not obvious to those being monitored);
- include basic contact details such as a simple website address, telephone number or email contact; and
- be an appropriate size depending on context such as whether they will be viewed by pedestrians or motorists.

The academies will provide a copy of these procedures, and the Privacy Notices, upon request.

## 6. Storage and Retention

Information captured by the CCTV systems will not be kept for longer than is necessary. Details will be included in our Retention Schedule.

Recorded material will be stored:

- in a way that maintains the integrity of the information; and
- in a secure environment with restricted access and which is locked when not occupied by authorised staff.

The Data Protection Officer, and staff at the Trust Office, are authorised to access the system and its recordings on a need-to-know basis. Other staff within the academies will be authorised by their Principals.

## 7. Disclosure

Information captured by the CCTV systems is highly likely to constitute personal data, including special category data. Decisions to disclose this information externally may only be made by the Principal of the academy or the Trust Office in consultation with the Data Protection Officer.

Requests will be considered on a case-by-case basis but such information may be disclosed to:

- the Police in order to support the detection and prevention of crime;
- the Health and Safety Executive, Local Authority, or any other statutory body charged with safeguarding children and young people in order to promote that safeguarding;
- individuals (or their authorised representatives) in response to a subject access request for their own personal data or where the requested information is subject to a court order; or
- the academy's insurance provider, where the information is required to support a claim for damages done to the insured property.

Where information is requested by another organisation, the request should be made in writing.

All requests will be logged by the Authorised Operator.

## 8. Training

All staff will be entitled to receive general training on data protection. Authorised Operators will require additional training before they are permitted access to the CCTV system. That will include:

- how to implement these procedures;
- that they are subject to a confidentiality duty and that it is a criminal offence to misuse surveillance system information;
- how to apply the arrangements set out in the Retention Schedule as they relate to information captured by the CCTV system;
- how to handle information securely;
- how to recognise both a subject access request and a freedom of information request, and what to do if such a request is received; and
- what to do if they receive a request for information from an official authority, such as the Police.

## 9. Monitoring and Review

The Principal for each academy will arrange for routine performance monitoring, including random operating checks. Such checks will consider, for example, whether:

- access restrictions are implemented appropriately and logs are kept up-to-date;
- signage is adequate; and
- recordings are disposed of in line with the Retention Schedule.

Additionally, independent monitoring may be carried out by the Data Protection Officer and/or the Trust Office. Such monitoring may take the form of a routine operating check, as above, but will also focus wider questions including whether:

- the system is addressing the needs and delivering the benefits that justify its use;
- the scheme complies with relevant legislation and codes of practice; and
- the technical, physical and organisational measures used are appropriate.

<b>Approved by:</b>	Summit Learning Trust	<b>Date:</b> June 2019
<b>Last reviewed on:</b>	Not Applicable	
<b>Next review due:</b>	May 2020	
<b>Monitoring &amp; review</b>	Data Protection Officer	
<b>Links</b>	<b>External:</b> Data Protection Act 2018; Freedom of Information Act 2012; ICO's Code of Practice for Surveillance Cameras and Personal Data; Regulation of Investigatory Power Act 2000; Equality Act 2010  <b>Internal:</b> GDPR Policy; Privacy Notices; Retention Schedule	
<b>Staff responsible</b>	Director of Estates and Facilities; Principals	