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PRINCIPAL: SACHA CORCORAN MBE

CCTV POLICY

Updated February 2025
Approved by the Principal

The Academy recognises that CCTV systems can be privacy intrusive.
For this reason, the Academy has carried out a data protection impact assessment with a view to evaluating whether the CCTV system in place is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the data protection impact assessment has informed the Academy's use of CCTV and the contents of this policy

1. Objectives

Review of this policy shall be repeated regularly and whenever new equipment is introduced, a review will be conducted, and a risk assessment put in place. We aim to conduct reviews no later than every two years.

The purpose of the CCTV system is to assist the Academy in reaching the following objectives:

(a) To protect pupils, staff and visitors against harm to their person and/or property;

(b) To increase a sense of personal safety and reduce the fear of crime;

(c) To protect the Academy buildings and assets;

(d) To support the police in preventing and detecting crime;

(e) To assist in identifying, apprehending and prosecuting offenders;

(f) To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence; and

(g) To assist in managing the Academy.

Purpose of This Policy

The purpose of this policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at the Academy. The CCTV system used by the Academy comprises of:

	Camera Type	Location	Sound	Recording Capacity	Swivel/Fixed
1	HV-Outdoor	Car Park Entrance	~~Y~~/N	Y/~~N~~	Fixed
2	HV-Outdoor	Car Park Area	~~Y~~/N	Y/~~N~~	Fixed
3	HV-Outdoor	Front of Café Works	~~Y~~/N	Y/~~N~~	Fixed
4	HV-Outdoor	Back of Café Works	~~Y~~/N	Y/~~N~~	Fixed
5	HV-Outdoor	Academy Main entrance 1	~~Y~~/N	Y/~~N~~	Fixed
6	HV-Outdoor	Academy Main entrance 2	~~Y~~/N	Y/~~N~~	Fixed
7	HV-Outdoor	Academy Wellbeing garden	~~Y~~/N	Y/~~N~~	Fixed
8	HV-Outdoor	Academy Football/Astro	~~Y~~/N	Y/~~N~~	Fixed
9	HV-Outdoor	Academy Overlooking Canopy	~~Y~~/N	Y/~~N~~	Fixed
10	HV-Outdoor	Academy Staff Area	~~Y~~/N	Y/~~N~~	Fixed
11	HV-Outdoor	FF Entrance	~~Y~~/N	Y/~~N~~	Fixed
12	HV-Outdoor	FF Back	~~Y~~/N	Y/~~N~~	Fixed
13	HV-Outdoor	FF Right Side	~~Y~~/N	Y/~~N~~	Fixed
14	HV-Outdoor	FF Left Side	~~Y~~/N	Y/~~N~~	Fixed
15	HV-Outdoor	Pathway to Reception	~~Y~~/N	Y/~~N~~	Fixed
16	HV-Indoor	GF Reception	~~Y~~/N	Y/~~N~~	Fixed
17	HV-Indoor	GF Turnstiles	~~Y~~/N	Y/~~N~~	Fixed
18	HV-Indoor	GF Drama Studio	~~Y~~/N	Y/~~N~~	Fixed
19	HV-Indoor	GF Theatre	~~Y~~/N	Y/~~N~~	Fixed
20	HV-Indoor	GF Theatre 2	~~Y~~/N	Y/~~N~~	Fixed
21	HV-Indoor	GF Theatre Curtain	~~Y~~/N	Y/~~N~~	Fixed
22	HV-Indoor	GF Behind Theatre	~~Y~~/N	Y/~~N~~	Fixed
23	HV-Indoor	GF Theatre Corridor	~~Y~~/N	Y/~~N~~	Fixed
24	HV-Indoor	GF PA Rehearsal Room	~~Y~~/N	Y/~~N~~	Fixed
25	HV-Indoor	GF Outside Gym	~~Y~~/N	Y/~~N~~	Fixed
26	HV-Indoor	GF H&F Classroom	~~Y~~/N	Y/~~N~~	Fixed
27	HV-Indoor	GF H&F studio 1	~~Y~~/N	Y/~~N~~	Fixed

28	HV-Indoor	GF H&F studio 2	~~Y~~/N	Y/~~N~~	Fixed
29	HV-Indoor	GF Left Exit (fire door)	~~Y~~/N	Y/~~N~~	Fixed
30	HV-Indoor	GF PA Classroom	~~Y~~/N	Y/~~N~~	Fixed
31	HV-Indoor	GF Dance Studio Corridor	~~Y~~/N	Y/~~N~~	Fixed
32	HV-Indoor	GF Dance Studio	~~Y~~/N	Y/~~N~~	Fixed
33	HV-Indoor	GF Middle Exit (fire door)	~~Y~~/N	Y/~~N~~	Fixed
34	HV-Indoor	GF Canteen Left	~~Y~~/N	Y/~~N~~	Fixed
35	HV-Indoor	GF Canteen Right	~~Y~~/N	Y/~~N~~	Fixed
36	HV-Indoor	GF Canopy	~~Y~~/N	Y/~~N~~	Fixed
37	HV-Indoor	GF Kitchen 1	~~Y~~/N	Y/~~N~~	Fixed
38	HV-Indoor	GF Kitchen 2	~~Y~~/N	Y/~~N~~	Fixed
39	HV-Indoor	GF Right Exit	~~Y~~/N	Y/~~N~~	Fixed
40	HV-Indoor	1F Left Exit Staircase	~~Y~~/N	Y/~~N~~	Fixed
41	HV-Indoor	1F Maths/English Corridor	~~Y~~/N	Y/~~N~~	Fixed
42	HV-Indoor	1F Maths 1.06	~~Y~~/N	Y/~~N~~	Fixed
43	HV-Indoor	1F English 1.04	~~Y~~/N	Y/~~N~~	Fixed
44	HV-Indoor	1F Maths 1.03	~~Y~~/N	Y/~~N~~	Fixed
45	HV-Indoor	1F Learning Hub	~~Y~~/N	Y/~~N~~	Fixed
46	HV-Indoor	1F Wellbeing 1.02	~~Y~~/N	Y/~~N~~	Fixed
47	HV-Indoor	1F IT Office Corridor	~~Y~~/N	Y/~~N~~	Fixed
48	HV-Indoor	1F Student Hub & Inclusion	~~Y~~/N	Y/~~N~~	Fixed
49	HV-Indoor	1F A&D studio 1 01.17	~~Y~~/N	Y/~~N~~	Fixed
50	HV-Indoor	1F A&D studio 2 01.17	~~Y~~/N	Y/~~N~~	Fixed
51	HV-Indoor	1F A&D Studio 3 01.18	~~Y~~/N	Y/~~N~~	Fixed
52	HV-Indoor	1F A&D PC Classroom 01.20	~~Y~~/N	Y/~~N~~	Fixed
53	HV-Indoor	1F A&D Studio 01.26	~~Y~~/N	Y/~~N~~	Fixed
54	HV-Indoor	1F Middle Exit Staircase	~~Y~~/N	Y/~~N~~	Fixed
55	HV-Indoor	1F Right Exit Staircase	~~Y~~/N	Y/~~N~~	Fixed

56	HV-Indoor	2F Left Exit Staircase	~~Y~~/N	Y/~~N~~	Fixed
57	HV-Indoor	2F Middle Exit Saircase	~~Y~~/N	Y/~~N~~	Fixed
58	HV-Indoor	2F Right Exit Staircase	~~Y~~/N	Y/~~N~~	Fixed
59	HV-Indoor	2F Media Corridor	~~Y~~/N	Y/~~N~~	Fixed
60	HV-Indoor	2F Media 2.08	~~Y~~/N	Y/~~N~~	Fixed
61	HV-Indoor	2F Media 2.06	~~Y~~/N	Y/~~N~~	Fixed
62	HV-Indoor	2F Edit Room B	~~Y~~/N	Y/~~N~~	Fixed
63	HV-Indoor	2F TV Studio	~~Y~~/N	Y/~~N~~	Fixed
64	HV-Indoor	2F Podcast Studio	~~Y~~/N	Y/~~N~~	Fixed
65	HV-Indoor	2F Music Rehearsal Room 1	~~Y~~/N	Y/~~N~~	Fixed
66	HV-Indoor	2F Music Rehearsal Room 2	~~Y~~/N	Y/~~N~~	Fixed
67	HV-Indoor	2F Music Rehearsal Room 4	~~Y~~/N	Y/~~N~~	Fixed
68	HV-Indoor	2F Music 02.15	~~Y~~/N	Y/~~N~~	Fixed
69	HV-Indoor	2F Music 02.16	~~Y~~/N	Y/~~N~~	Fixed
70	HV-Indoor	2F Music Studio 3 02.28	~~Y~~/N	Y/~~N~~	Fixed
71	HV-Indoor	2F Music Studio 2 02.27	~~Y~~/N	Y/~~N~~	Fixed
72	HV-Indoor	2F Live room 2 02.29	~~Y~~/N	Y/~~N~~	Fixed
73	HV-Indoor	2F Music 02.17	~~Y~~/N	Y/~~N~~	Fixed
74	HV-Indoor	2F Live Room 1 02.25	~~Y~~/N	Y/~~N~~	Fixed
75	HV-Indoor	2F Computer Suite 02.20	~~Y~~/N	Y/~~N~~	Fixed
76	HV-Indoor	2F Music Corridor outside 02.20	~~Y~~/N	Y/~~N~~	Fixed
77	HV-Indoor	Café Works	~~Y~~/N	Y/~~N~~	Fixed
78	HV-Indoor	FF Corridor	~~Y~~/N	Y/~~N~~	Fixed
79	HV-Indoor	FF Fashion 03.01	~~Y~~/N	Y/~~N~~	Fixed
80	HV-Indoor	FF Fashion Studio 03.02	~~Y~~/N	Y/~~N~~	Fixed
81	HV-Indoor	FF Fashion Industry Studio 03.03	~~Y~~/N	Y/~~N~~	Fixed
82	HV-Indoor		~~Y~~/N	Y/~~N~~	Fixed

CCTV cameras are not installed in areas in which individuals would have an expectation of privacy such as toilets, changing facilities, etc.

Some of our CCTV camera's audio record, as detailed above. We understand that audio recording CCTV is seen as highly intrusive. Therefore, we take the following steps:

- Have the function to turn off audio recording.

2. Statement of Intent

CCTV cameras are installed in such a way that they are not hidden from view. We do not covertly record anyone. Signs are predominantly displayed where relevant so that staff, students, visitors and members of the public are made aware that they are entering an area covered by CCTV. The signs also contain contact details as well as a statement of purposes for which CCTV is used.

The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.

The Academy will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

The system has been designed so far as possible to deny observation on adjacent private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design have endeavoured to ensure that the system 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.

Warning signs, as required by the Code of Practice of the Information Commissioner, will be clearly visible on the site and make clear who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

CCTV images are not retained for longer than necessary, taking into account the purposes for which they are processed. Data storage is automatically overwritten by the system after a period of 30 days.

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. In the absence of a compelling need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 6 months.

3. System Management

Access to the CCTV system and data shall be password protected and will be kept in a secure area.

The CCTV system will be administered and managed by Deputy Director of IT and Facilities who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager, the system will be managed by Facilities Manager.

The system and the data collected will only be available to the Systems Manager, his/her replacement and appropriate members of the senior leadership team as determined by the Headteacher.

The CCTV system is designed to be in operation 7am to 7pm, though the Academy does not guarantee that it will be working during these hours.

The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that the cameras are functional.

Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by proving clear, usable images.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

Where a person other than those mentioned above requests access to the CCTV data or system, the System Manager must satisfy themselves of the identity and legitimacy of purpose of any person making such request. Where any doubt exists, access will be refused.

Details of all visits and visitors will be recorded in a system logbook including time/data of access and details of images viewed and the purpose for so doing.

4. Downloading Captured Data on to Other Media

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings), any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures: -

(a) Each downloaded media must be identified by a unique mark.

(b) Before use, each downloaded media must be cleaned of any previous recording.

(c) The System Manager will register the date and time of downloaded media insertion, including its reference.

(d) Downloaded media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a

downloaded media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.

(e) If downloaded media is archived, the reference must be noted.

(f) If downloaded media is put onto a device, the device will be encrypted, and password protected.

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his/her replacement and the Principal and other Senior Leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable, if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the downloaded media (and any images contained thereon) remains the property of the Academy and downloaded media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The Academy also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media, this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the Academy to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until needed by the police.

Applications received from outside bodies (e.g., solicitors or parents) to view or release images will be referred to the Academy's Data Protection Officer and a decision made by a senior leader of the Academy in consultation with the Academy's Data Protection Officer.

5. Complaints About the Use of CCTV

Any complaints in relation to the Academy's CCTV system should be addressed to the Academy Business Manager via AcademyDataProtection@bigcreative.education or 02084983300.

6. Requests for Access by the Data Subject

The Data Protection Act provides data subjects – those whose image has been captured by the CCTV system and can be identified - with a right to access data held about themselves, including

those obtained by CCTV. Requests for such data should be made to the Academy Business Manager via AcademyDataProtection@bigcreative.education or 02084983300.

7. Public Information

Copies of this policy will be available to the public from the Academy website.