

 The Talentum Learning Trust		Trust Policy Document			
Approved by:	Trust Board	Issue date:	June 2019	Review date:	June 2022
Policy Owner:	Headteachers	Page: 1 of 5			
Audience:	Trustees <input checked="" type="checkbox"/>	Staff <input checked="" type="checkbox"/>	Pupils <input checked="" type="checkbox"/>	Local Governing Bodies <input checked="" type="checkbox"/>	
	Parents <input checked="" type="checkbox"/>	General Public <input checked="" type="checkbox"/>			

CCTV System Policy

1. Introduction

- 1.1 The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) systems within The Talentum Learning Trust, hereafter referred to as 'TTLT'
- 1.2 The system comprises a number of fixed and dome cameras located around TTLT school sites.
- 1.3 This Code follows Data Protection Act guidelines.
- 1.4 The Code of Practice will be subject to review bi-annually to include consultation as appropriate with interested parties.
- 1.5 The CCTV systems are owned by TTLT.

2. Objectives of the CCTV scheme

- 2.1
 - (a) To protect TTLT buildings and their assets
 - (b) To increase personal safety and reduce the fear of crime
 - (c) To support the Police in a bid to deter and detect crime
 - (d) To assist in identifying, apprehending and prosecuting offenders
 - (e) To protect members of the public and private property
 - (f) To assist in managing the schools

3. Statement of intent

- 3.1 The CCTV Scheme will be 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.
- 3.2 TTLT will treat the system and all information, documents and recordings obtained and used as data, which are protected by the Act.
- 3.3 Cameras will be used to monitor activities within the schools and their car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of TTLT, together with its visitors.
- 3.4.1 Classroom footage will not be used for the purposes of staff Performance Management, capability or disciplinary action.
- 3.4.2 Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.
- 3.4.3 Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation

being obtained using TFLT forms for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.

- 3.5 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Discs will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Discs will never be released to the media for purposes of entertainment.
- 3.6 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.
- 3.7 Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the CCTV systems within the school sites.

4. Operation of the system

- 4.1 The Scheme will be administered and managed by the CEO and Headteachers', in accordance with the principles and objectives expressed in the code.
- 4.2 The day-to-day management will be the responsibility of both the Senior Leadership Teams and the School Support Services Managers during the day and the Site Team out of hours and at weekends.
- 4.3 The Control facility will only be accessed by the SLT, School Support Services Managers and the Site Team.
- 4.4 The CCTV system will be operated 24 hours each day, every day of the year.

5. Control Facility

- 5.1 The Site Team will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.
- 5.2 Access to the CCTV Control Facility will be strictly limited to the SLT, School Support Services Managers and the Site Teams.
- 5.3 Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.
- 5.4 Visitors and other contractors wishing to access the Control Facility will be subject to particular arrangement as outlined below.
- 5.5 The CEO or Headteachers' must satisfy themselves over the identity of any other visitors wishing to access the Control facility and the purpose of the visit. Where any doubt exists access will be refused. Details of all visits and visitors will be endorsed in the Control Facility logbook.
- 5.6 The system may generate a certain amount of interest. It is vital that operations are managed with the minimum of disruption. Casual visits will not be permitted. Visitors must first obtain permission from the CEO, or the Headteachers and must be accompanied by an authorised member of staff throughout the visit.
- 5.7 Any visit may be immediately curtailed if prevailing operational requirements make this necessary.
- 5.8 If out of hours emergency maintenance arises, the CEO, or the Headteachers, must be satisfied of the identity and purpose of contractors before allowing entry.
- 5.9 A visitors book will be maintained in the relevant reception. Full details of visitors including time/data of entry and exit will be recorded.
- 5.10 There must always be at least one authorised person present within the Control facility during out of hours and weekends or the Control Facility must be locked. During the working day when not manned the facility must be kept secured.

- 5.11 Other administrative functions will include maintaining discs and hard disc space, filing and maintaining occurrence and system maintenance logs.
- 5.12 Emergency procedures will be used in appropriate cases to call the Emergency Services.

6. Liaison

- 6.1 Liaison meetings may be held with all bodies involved in the support of the system.

7. Monitoring procedures

- 7.1 Camera surveillance may be maintained at all times.
- 7.2.1 A monitor is installed in the Control facility to which pictures will be continuously recorded.

8. Disc procedures

- 8.1 In order to maintain and preserve the integrity of the discs used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:
 - (i) Each disc must be identified by a unique mark.
 - (ii) Before use each disc must be cleaned of any previous recording.
 - (iii) The controller shall register the date and time of disc insert, including disc reference.
 - (iv) A disc required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence disc store. If a disc 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, signed by the controller, dated and returned to the evidence disc store.
 - (v) If the disc is archived the reference must be noted.
- 8.2 Discs may be viewed by the Police for the prevention and detection of crime, authorised officers of TTLT for supervision, and authorised demonstration and training.
- 8.3 A record will be maintained of the release of discs to the Police or other authorised applicants. A register will be available for this purpose.
- 8.4 Viewing of discs by the Police must be recorded in writing and in the log book. Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.
- 8.5 Should a disc be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1 (iv) of this Code. Discs will only be released to the Police on the clear understanding that the disc remains the property of TTLT, and both the disc and information contained on it are to be treated in accordance with this code. TTLT also retains the right to refuse permission for the Police to pass to any other person the disc or any part of the information contained thereon. On occasions when a Court requires the release of an original disc this will be produced from the secure evidence disc store, complete in its sealed bag.
- 8.6 The Police may require TTLT to retain the stored disc for possible use as evidence in the future. Such discs will be properly indexed and properly and securely stored until they are needed by the Police.
- 8.7 Applications received from outside bodies (e.g. solicitors) to view or release tapes will be referred to the CEO. In these circumstances discs will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee can be

charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

9. Breaches of the code (including breaches of security)

- 9.1 Any breach of the Code of Practice by TTLT staff will be initially investigated by the CEO, in order for him to take the appropriate disciplinary action.
- 9.2 Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

10. Assessment of the scheme and code of practice

- 10.1 Performance monitoring, including random operating checks, may be carried out by the Site Managers.

11. Complaints

- 11.1.1 Any complaints about TTLT's CCTV system should be addressed to the CEO.
- 11.2 Complaints will be investigated in accordance with Section 9 of this Code.

12 Access by the Data Subject

- 12.1 The Data Protection Act and GDPR (2018) provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.
- 12.2 Requests for Data Subject Access should be made on an application form available from the CEO or the schools.

13. Public information

- 13.1 Copies of this Code of Practice will be available to the public from the School Offices and the CEO.

Summary of Key Points

- This Code of Practice will be reviewed every two years.
- The CCTV systems are owned and operated by TTLT.
- Classroom footage will not be used for the purposes of staff Performance Management, capability or disciplinary action.
- The Control facility will not be manned out of school hours.
- The Control facility is not open to visitors except by prior arrangement and with good reason.
- Liaison meetings may be held with the Police and other bodies.
- Recording discs used will be properly indexed, stored and destroyed after appropriate use.
- Authorised TTLT Officers and the Police may only view discs.
- Discs required as evidence will be properly recorded, witnessed and packaged before copies are released to the police.

- Discs will not be made available to the media for commercial or entertainment reasons.
- Discs will be disposed of securely by incineration.
- The CEO will investigate any breaches of this code. An independent investigation will be carried out for serious breaches.
- Breaches of the code and complaints will be reported to the CEO.