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## **1. POLICY STATEMENT**

The Arthur Terry Learning Partnership (ATLP) uses Close Circuit Television (“CCTV”) at several of its academies. The purpose of this policy is to set out the position of the ATLP as to the management, operation and use of the CCTV within the Academy Trust.

This policy applies to all members of staff across the ATLP, visitors to our individual premises and all other persons whose images may be captured by the CCTV system.

- This policy takes account of all applicable legislation and guidance, including:
- The General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018 (together the ‘Data Protection Legislation’)

This policy and procedure set out the position of the Academy Trust in relation to its use of CCTV.

## **2. PURPOSE OF CCTV**

The ATLP uses CCTV to ensure that:

- Students, staff and members of the public using these facilities are safeguarded
- The facilities are secure
- It deters anti-social or illegal activity
- We have the ability to aid the police to identify persons if an offence is committed

## **3. DESCRIPTION OF SYSTEM**

Those academies who use CCTV may have fixed and/or moving cameras on sites. Some cameras may be equipped for sound recording.

## **4. SITING OF CAMERAS**

All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.

Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The ATLP will make all reasonable efforts to ensure that areas outside of its premises are not recorded.

Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.

CCTV systems are designed for maximum effectiveness and efficiency. The ATLP cannot however guarantee that every incident will be detected or covered and ‘blind spots’ may exist.

CCTV systems will not be trained on individuals unless an immediate response to an incident is required. CCTV systems will not be trained on private vehicles or property outside the perimeter of the school.

## **5. PRIVACY IMPACT ASSESSMENT**

Prior to the installation of any new CCTV camera, or system, a review will be conducted by the ATLP to ensure that the proposed installation is compliant with legislation and Information Commissioners Office (ICO) guidance.

The ATLP will adopt a privacy by design approach when installing new cameras and systems, considering the purpose of each camera as to avoid recording and storing excessive amounts of personal data.

## **6. MANAGEMENT AND ACCESS**

On a day to day basis the CCTV will be operated by members of staff in academies with delegated authority as approved by the headteacher.

The viewing of CCTV images will be restricted to members of staff in academies only with delegated authority to view images.

Recorded images which are stored by the CCTV system will be restricted to access only by members of staff within the academies with delegated authority to view images.

No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy and procedure as to disclosure of images.

The CCTV systems should be checked regularly by the appropriate members of staff in academies to ensure that it is operating effectively.

Some of our academies are Private Finance Initiatives (PFI), and the sites and facilities are managed by an outsourced Facilities Management (FM) provider. Where the FM provider owns a CCTV system in an ATLP academy, the FM providers are responsible for the administration and management of system, in accordance with their own policies, all statutory obligations and codes of practice.

Access to the system will be strictly limited to those staff with delegated authority. And images/recorded data can only be viewed with their consent.

## **7. STORAGE AND RETENTION OF IMAGES**

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

The ATLP will ensure that processes are in place to prevent the unlawful or inadvertent disclosure of any recorded images.

All stored data will be kept in a secured area or via password protected access.

Images will only be used only for the purposes for which they are intended, including supporting public safety, protection of students, staff and law enforcement.

## **8. DISCLOSURE OF IMAGES TO DATA SUBJECTS**

The General Data Protection Regulation provides Data Subjects (individuals to whom personal data relate) with a right to data held about themselves, including those obtained by CCTV.

In order for us to locate relevant footage, any requests for copies of recorded **CCTV images** must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.

Requests for Data Subject Access should be made to the relevant school's GDPR contact. The named contact can be obtained by contacting the school in question.

## **9. DISCLOSURE OF IMAGES TO THIRD PARTIES**

The ATLP will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

## **10. MISUSE OF CCTV SYSTEMS**

Any member of staff who breaches this policy and procedure may be subject to disciplinary action.