

**BALLYMENA ACADEMY**

**POLICY STATEMENT**

**IN RELATION TO**

**CCTV**

**Reviewed December, 2022.**

**Approved at**

**Board of Governors’ Meeting**

**16th January, 2023.**

**Ballymena Academy CCTV Policy (Draft 3)**

Ballymena Academy uses closed circuit television (CCTV) images to :-

* identify and reduce antisocial behaviour and criminal activity on the school premises;
* monitor the school grounds and buildings in order to provide a safe and secure environment for pupils, staff and visitors;
* prevent the loss or damage to school property;
* assist in the prosecution of persons who have committed an offence.

Whilst camera positions have been carefully located to ensure that they are appropriate and effective, it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

The CCTV system is owned and operated by the school, the deployment of which is determined by the school’s leadership team. It comprises a number of fixed cameras located internally and externally which operate 24 hours a day, every day of the year. The system is password protected. The system does not have sound recording capability. The school will ensure that private dwellings and property other than that in periphery of a view will not be covered by the CCTV cameras. Cameras are not directed at individuals.

The School’s CCTV is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2016/679. The use of CCTV, and the associated images is covered by the Data Protection Regulations 2018.

**Management and monitoring**

The overall management of the scheme is the responsibility of the Principal. Day to day management and monitoring are the responsibility of the Maintenance Officer with the support of the Corporate Services Vice-Principal. These are the only two members of staff who are permitted to operate the system. Other authorised employees with access to images are made aware of the procedures that need to be followed when accessing recorded images. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and the school community.

**Maintenance**

The Maintenance Officer will, on a daily basis, check that all the cameras are functional and that the system is recording. A maintenance contract is in place with Longmore Electronics who carry out an annual maintenance check of the system and assist in any emergency call outs in the event of the system failing to work.

**CCTV Signage**

Warning signs, as required by The Code of Practice of the Information Commissioner, are placed at key entry points to the school premises to advise that the area is covered by the school CCTV system, stating the purpose of the CCTV, the name of the school and the contact telephone number or address for enquiries.

**Siting of cameras**

Cameras are sited so that they only capture images relevant to the purposes for which they are installed. Care will be taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

CCTV will not be used in classrooms but will be used in areas within school that have been identified by staff and pupils as not being easily monitored.

Members of staff have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

**Covert Monitoring**

The school may in exceptional circumstances set up covert monitoring:-

* where there are grounds to suspect serious misconduct;
* where there is good cause to suspect that an illegal or unauthorised action(s), is taking place,
* 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 e.g. toilet cubicles.

**Storage and retention of CCTV images**

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.

Images captured by the system will usually be stored for a period not longer than 30 days and are erased unless required as part of a criminal investigation or court proceedings. Hard drives containing stored images will be physically destroyed.

**Access to CCTV images**

All requests for access or disclosure will be recorded in a CCTV log which will be maintained by the Vice-Principal (Corporate Services) The log will state the following:

•  Name of person requesting data, date and time

•  The purpose for which the information is required

•  Details of data supplied and format of any copy given (still image or DVD)

Requests to view recordings must be made to the Vice-Principal (Corporate Services). If approved, the Maintenance Officer will be asked to view the recordings and report back the findings. The Vice-Principal may authorise other members of staff to view images with the Maintenance Officer where he deems it to be necessary to meet the purpose of the viewing.

**Subject Access Requests (SAR)**

Individuals have the right to request access to CCTV footage relating to themselves 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, date, time, location, purpose etc.

The school will respond to requests within 30 calendar days of receiving the written request and fee. A fee of £10 will charged per request.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going 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. If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However, very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Principal should be contacted in the first instance and appropriate legal advice may be required.

Requests for access to images should be made in writing to the Principal.

The data may be used within the school’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 school will be dealt with according to the school’s complaints procedure.

**Review**

A review of the school’s use of CCTV will be conducted annually.In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.