




The Park Federation Academy Trust

**Use of CCTV Policy
2021**

Version History

Version	Date	Status and Purpose	Changes overview
1	22 June 2013	Draft for comment	
2	08 July 2013	Approved	
3	05 February 2015	Approved	Incorporating all academies
4	04 September 2018	Review	
5	July 2020	Periodic Review	Update to number of cameras in place at Cranford Park Academy and West Drayton Academy
6	July 2021	Periodic review	Internal access request form added

Approval History

Chief Executive Officer and Federation Principal approved this policy on behalf of the Board of Directors: Dr. Martin Young.
Approved on 15th July 2021 
Next review: July 2022

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To enable continuous improvement, all readers encouraged to notify the author of errors, omissions and any other form of feedback.

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Legality

There are two important points within the CCTV Code of Practice 2008, which are basic points of law that must be adhered to.

CCTV Signs

CCTV signs are erected around the building within prominent locations that clearly identifies that CCTV recording is in operation. Signs are located at the entrance gate, the building entrance and inside reception.

Registering the CCTV System

The CCTV system is registered with the Information Commissioners office.

Organisation name: The Park Federation Academy Trust

Registration reference: ZA098238

Trading names Godolphin Junior Academy, West Drayton Academy, Cranford Park Academy, Lake Farm Park Academy, James Elliman Academy, Montem Academy, Western House Academy and Wood End Park Academy

The Data Protection Act 2018

The Data Protection Act 2018 relates to data processing of all types. The definition of data under the Act is 'Information which is being processed by equipment operating automatically in response to instructions; or is recorded with the intention that it should be processed'.

The definition of Processing is much wider in its scope than the previous legislation 'Obtaining, recording or holding data, carrying out any operation or set of operations on the data, organisation, adaptation or alterations, retrieval, consultation or use of the data, disclosure of the data by transmission, dissemination, or otherwise making available, alignment, combination, blocking, erasure or destruction'.

Data in the case of CCTV recordings is in the form of recorded images of individuals that can be identified from these images.

Having regard for these definitions, it will be recognised that the use of CCTV for surveillance purposes is encompassed by the requirements of the Data Protection Act.

Objectives

Operators of the system have access to a clear statement of the objectives of the system and responsibilities of those involved in its operation and management and to restrict unauthorised persons from gaining access to recorded images.

Confidentiality

Operators of the system are aware of the need for confidentiality and that recorded information must be kept secure and available only to those directly connected with achieving the objectives of the system.

Copy Recordings

Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation, or a valid Subject Access request. Copies are only issued by the system manager to those directly connected with achieving the objectives of the system. Appendix A can be utilised to assist in issuing recorded images to authorised agents such as the police.

Information Sharing (Section 115, Crime and Disorder Act 1998)

The Crime and Disorder Act creates a power to share information from the System Owner/Operator to the Police and between the Police Forces, Police Authorities, Probation Committees, Local Authorities and Health Authorities.

Retention

The archive period of recordings is no longer than is necessary to achieve the objectives of the system. The archive period is 30 days unless the footage is required to be retained for lawful purposes.

Erasure

Digital recorders are set up in such a way as to overwrite old footage with new footage after the retention period has been reached.

Covert Recording

Because fairness requires that we install signs to make individuals aware that they are entering an area where their images are recorded, it follows that failure to provide signs are a breach of the Data Protection Act.

However, we are able to rely on an exemption of the Data Protection Act which states that personal data processed for reasons of prevention and detection of crime and apprehension and prosecution of offenders are exempt. Providing that the following criteria are met:

- We have assessed that if we had to inform individuals that recording was taking place it would prejudice our objective.
- We have reasonable cause to suspect specific criminal activity is taking place.
- That covert processing is only carried out for a limited and reasonable period of time and relates to the specific suspected criminal activity.

We have decided in principle that we wish to adopt covert recording. We have a clear documented procedure which sets out how we determine whether the use of covert recording is appropriate in an individual case. A confidential appendix regarding our decision that covert recording is appropriate is lodged with the Chief Executive Officer and Federation Principal.

Traceability and Record Keeping

Any recorded images that are copied to a third party data source, such as a video tape, USB, CD or DVD recordings, are identified by a unique serial number indelibly marked on the body of the media. The unique identity of the recording is obviously compromised if it is applied only to the outer cover.

Recordings must be logged and traceable throughout their life within the system. If images are copied to a third party media this is documented in Appendix A.

A routine audit is undertaken at regular intervals to ensure that recorded images are actually recording and that no fault exists with the recording system. The system is maintained by a maintenance company.

Original recordings are only found:

- a) Within the recognised secure storage system
- b) Operational in the recording device
- c) Secured in an evidence bag

Copies of recorded information are strictly controlled and only made in relation to incidents the subject of investigation or a valid subject access request. Copies are only issued by the system manager to those directly connected with achieving the objectives of the system.

Time and Date Stamping

The correct time and date is overlaid on the recorded image. These date and time settings are checked and corrected as part of the routine maintenance visits.

Secure Storage of Recordings

The recordings and recording/processing equipment are only accessible to those directly concerned with achieving the objectives of the system.

Recordings and Recording/Processing equipment are located in a secured lockable enclosure accessible only to authorised persons. A register of authorised users is maintained at all times.

CODE OF PRACTICE POLICY STATEMENT

This code of practice policy statement relates to the Closed Circuit Television System installed within The Park Federation Academy Trust and in particular:

Cranford Park Academy, Phelps Way, Hayes, Middlesex, UB3 4LQ,
James Elliman Academy, Elliman Avenue, Slough Berkshire, SL2 5BA ,
Lake Farm Park Academy, Botwell Common Road, Hayes, Middlesex, UB3 1JA,
Montem Academy, Chalvey Grove, Slough Berkshire, SL1 2TE,
Western House Academy, Richards Way, Slough Berksire, SL1 5TJ.
Wood End Park Academy, Judge Heath Lane, Hayes, Middlesex UB3 2PD.
The Godolphin Junior Academy, Oatlands Drive, Slough, Berkshire, SL1 3HS
West Drayton Academy, Kingston Lane, West Drayton, UB7 9EA

The beneficial owner of the system is The Park Federation Academy Trust Limited. The system data protection registration number for the Trust and its entire academy's is ZA098238.

The system manager is The Chief Executive Officer of The Park Federation Academy Trust who has the overall responsibility of ensuring the management of the systems recorded images, maintenance and training of persons authorised to use the system and who has responsibility as Data Controller for the CCTV system.

Other authorised personnel trained to operate the system are:

1. The Chief Operating Officer, Estates Manager and the Premises Teams

The objectives of the system are to assist in the detection of crime, provide evidence of crime and to deter those who have criminal intent and to give confidence to staff and visitors that they are in a secure environment. To provide management information relating to Health & Safety matters.

System

The system comprises of the following primary items:

Recording media type: Digital Recorder DVR recording system					
The system records images from: Colour and Black and White cameras					
Academy	Monitors	Fixed cameras	Moveable cameras	Covert cameras	CCTV signs
Cranford Park	05	76	04	0	12
James Elliman	01	81	0	0	10
Lake Farm Park	01	24	0	0	09
Montem	01	68	0	0	16
Western House	01	25	0	0	05
Wood End	01	20	01	0	11
Godolphin Junior	02	39	0	0	06
West Drayton	02	57	0	0	12

The operating manuals relating to the specific items of equipment have been compiled and are located in the respective CCTV Server Room. It is the responsibility of the Principals to ensure that all authorised staff are aware of the function of the system and capable of operating the system.

General Principles

The principles detailed in the CCTV Code of Practice 2008 are observed in the operation and management of the system.

APPENDIX A: SUBJECT ACCESS REQUEST

Date of footage	
Start time of footage	
End time of footage	
Cameras of required footage	
Current time on recorder	
Time using speaking clock	
Person requesting footage	
Copy of footage has been recorded to DC/DVD/USB	
Serial number of copied media disk	

The above information and associated CCTV footage has been compiled on behalf of:

The Park Federation Academy Trust

The footage detail above has been compiled in accordance with the CCTV code of practice 2008. It is the recipient's responsibility to store and dispose of the recorded media in accordance with the CCTV Code of Practice 2008 and the recipients take full responsibility for the safe keeping of the footage as detailed above. A copy of the codes can be obtained by visiting www.ico.gov.uk.

A £10.00 charge will be applied for producing information. The Park Federation Academy Trust will maintain a log of access requests detailing who the requests have been made by.

Issuer of the above footage

Name	Signature	Date

Recipient of the above footage

Name	Signature	Date
Address		
Identification		

APPENDIX B Internal Access Request

CCTV – Request to view footage

In line with GDPR and our Policy this form should be completed prior to any footage being viewed

You should discuss your request with you Principal in the first instance, but all requests should be directed to Jas Sohal – Data Protection Officer and approval must be given before footage is viewed. The CCTV system has been installed to aid security of our buildings and boundaries as well as safe guarding of our staff and students and should not be used for personal use.

This section should be completed by the staff member who is requesting the CCTV should be viewed

Academy	Principal	Date of request (today's date)	Request made by (Print)	Signature

Description of Incident / Person(s)	Camera Location:	
Date of incident:	Approximate time of incident (24 hours):	
Why have you requested the CCTV be viewed?		

To be completed by Jas Sohal – Data Protection Officer

Requested approved	Signature/date/time	Request denied – reason given	Signature/date/time

To be completed by the Premises Team or the person viewing the CCTV

Name of person who recorded the image(s) onto digital media:	Signature:	Date Recorded:
Date images were recorded:	Disc reference number/location of the footage:	
Name of person who received the image(s):	Signature:	Date:

CCTV viewed at which location:			
Operated by:		Position Held:	
Record of down load taken by:		Position Held:	