

CCTV Policy

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Introduction

Lincolnshire Gateway Academies Trust (the Trust) makes use of CCTV, including audio recordings where necessary, to protect its properties, assets and staff in the event of theft, malicious damage or threatening behaviour. The CCTV the Trust utilises is fully registered with the Information Commissioner's Office (ICO) and is compliant with both legal and regulatory guidelines and all recordings made are subject to the same regulations and restrictions as other personal data set out in our Data Protection Policy. The planning and design of the Trust CCTV system has endeavoured to be as efficient as possible, however, it is not possible to guarantee that the system will detect every incident taking place in the area of coverage.

The Trust has placed warning signs, as required by the ICO CCTV Code of Practice¹, on all access routes to areas covered by the CCTV. Additional warning signs are placed in clear and prominent locations where the CCTV system captures audio as well as video.

This policy applies to all staff, with a particular focus on those whose job role grants them access to the CCTV recordings and camera controls. This policy is to be used in conjunction with all other Trust policies and in the event of contradictory information this document takes precedence only when dealing with recordings and images captured by the CCTV system.

Guidelines for Use

The CCTV scheme is exclusively for the protection and security of persons, buildings and property within Trust grounds and every effort is made to not allow CCTV cameras to view private homes, gardens or other private property. Audio recordings are stored with the raw video footage but are only accessed when required and in response to threatening or abusive behaviour towards members of the Trust staff in the reception areas of the Trust's various academies or as outlined below.

In accordance with the Regulation of Investigatory Power Act 2000², which prohibits directed surveillance, the cameras should not be moved, zoomed or otherwise manipulated to deliberately follow an individual unless the circumstances reasonably require an immediate response. Materials or knowledge secured as a result of CCTV operation must not be used for personal or commercial gain and footage captured by Trust cameras will not be shared with the media unless in accordance with an ongoing investigation in which the Police have granted permission for the footage release.

Use of the System

The Trust CCTV system is administered by the Principal of each individual academy and operated by the ICS team who will check and regularly confirm the efficacy of the system and ensure that all cameras are fully functional and operating as intended. The CCTV

¹ https://ico.org.uk/media/1542/cctv-code-of-practice.pdf

² https://www.legislation.gov.uk/ukpga/2000/23/part/II

system records 24 hours a day, every day of the year. Camera surveillance may be monitored at all times and will capture continually.

Access to CCTV recordings is limited to the ICS Team and Senior Leadership within each academy including Heads of House. When not being manned the CCTV system is kept secure. The Trust does not keep any recordings for longer than is necessary and unless an incident occurs will clear all CCTV recordings after a minimum of 14, and no more than 30 days.

Incident Recording

In the event that footage captured by the CCTV system is deemed to be necessary to keep for longer than 30 days or for usage outside of the Trust, the footage will be captured and recorded onto portable media. The Trust will ensure that any portable media containing CCTV footage is clearly labelled and marked with a unique identifier to ensure that it is handed to the appropriate body and is as easy as possible for them to utilise. As soon as we are able to legally do so, the footage on the portable media will be permanently destroyed. Such portable media may be requested by the Police under section 29 of the Data Protection Act³ and the Trust will cooperate fully with any lawful enquiry into CCTV footage.

Other bodies may request footage from the Trust CCTV system for other legal purposes. In such an instance the individuals must contact the Principal in writing as soon as possible in order to ensure the footage is not deleted under normal business practice. Should the Principal be satisfied that the request is both lawful and for a legal purpose the footage requested will be provided in a timely manner.

³ https://www.legislation.gov.uk/ukpga/1998/29/section/29