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**Focus 1st Academy**

**CCTV Policy**

**Focus 1st Academy is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment!**

Working in Partnership with North London Schools & Local Authorities since 2000

Accredited Independent School Status 2014 (Registration N0. 308/6003)

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Focus Inception

*Focus 1st Academy was set up in the year 2000 using European Social Fund to provide education and training and to-date has defied all the odds and was awarded the Independent School status in August 2014. This enables us to work in partnership with schools and local authorities to provide an alternative method of education for 14 to 16 year olds. Our student referrals are some of the most vulnerable young people and it is our duty to ensure that they are equipped with the appropriate skills and qualifications to ensure full participation within the modern workplace. Our team of professionals consisting of tutors, tutor assistance, pastoral support staff and mentors to nurture the students ensuring our work-based-learning approach alongside a variety of techniques are utilised and compatible to ensure the prevention of social and economic exclusion prior to adulthood which is underpinned through the subjects delivered whilst in classroom environment as well as on an individual basis.*

Focus Ethos

*Our programme fulfils the need of students who are disengaged from academic studies and may be exhibiting behavioural problems as a result. Our hands-on approach to learning creates an inspirational motivation for students wishing to pursue a career via the vocational route. The students are taught methods on how to improve their social skills in preparation for work/apprenticeship schemes and/or further education by learning in real-life situations and participating in sports, art and drama to express emotions. We believe that all individuals have a certain quality, which is sometimes concealed due to lack of confidence, mixed sentiments or disabilities. As such, recognising and coming to terms with barriers is a small part of the conflict, we are certain that all individuals are aware of their own weaknesses; the most vital part is engaging with professionals and adhere to individual training plans set which in turn prepares our students for economic and social integration into adulthood.*

The CCTV Policy

Purpose

The purpose of this policy is to regulate the management, operation and use of the CCTV (Closed Circuit Television) systems at Focus 1st Academy. The CCTV systems used within our school are used:

* To protect pupils, staff and visitors against harm to their person and/ or property.
* To increase a sense of personal safety and reduce the fear of crime.
* To protect the school buildings and assets.
* To support the police in preventing and detecting crime.
* To assist in identifying, apprehending and prosecuting offenders.
* To assist in establishing the cause of accidents and other adverse incidents and prevent reoccurrence.
* Preventing bullying
* To assist in managing and monitoring the schools’ behaviour

The system does have sound recording capability.

Requirements

* The CCTV system will seek to comply with the requirements of both the Data Protection Act and the most recent Commissioner's Code of Practice.
* Focus 1st Academy will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.
* The systems have been designed so far as possible to avoid observation of nearby private homes, gardens and other areas of private property.
* Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.
* Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.
* The system has been planned and designed to ensure maximum effectiveness and efficiency but it is not possible to guarantee that it will cover or detect every single incident taking place in the areas of coverage.
* Warning signs, as required by the Code of Practice of the Information Commissioner, will be clearly visible on the site and make clear who is responsible for the equipment.
* Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.
* CCTV images are not retained for longer than necessary, taking into account the purposes for which they are processed. Data storage is automatically overwritten by the system after a period of 30 days.
* Recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated. In the absence of compelling a need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 30 days.

System management

* The CCTV system will be kept in a secure area and access to the system and data shall be password protected.
* The CCTV system will be administered and managed by the IT Network and Security, who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the System Manager, the system will be managed by the Head Teacher/Deputy Head.
* CCTV footage can be viewed in real time & in play back from the main school computer/ monitor in the Deputy Heads office. Security guard - Cairo Romain also has on his mobile phone as well as Head Teacher – Marina Savva.
* The system and the data collected will only be available to the Systems Manager, senior members of the Team, the school senior leadership team and site management team as determined by the Head.
* The CCTV system is designed to be in operation 24 hours a day every day of the year, though this does not guarantee that it will be working during these hours.
* The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.
* Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by providing clear, usable images.
* Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals without authorisation in accordance with the Regulation of Investigatory Power Act 2000.
* Where a person other than those mentioned above requests access to the CCTV data or system, the System Manager must satisfy him/ herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists, access will be refused.
* Details of all visits and visitors will be recorded in a system log book including time/ data of access and details of images viewed and the purpose for doing so.

Location of Cameras:

The cameras are sited so that they only capture images relevant to the purposes for which they have been installed (as described above), and 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 the images captured comply with the legislation. The School will make every effort to position the cameras so that their coverage is restricted to the School premises, which includes both indoor and outdoor areas.

Cameras are situated:

* In all Four classrooms
* Bottom hallway
* Middle hallway
* Top hallway
* Head Teachers Office
* Reception Office
* Medical Room
* Finance Office
* At the front door to the school (entrance)

Downloading captured data onto other media

In order to maintain and preserve the integrity of the data (and to ensure admissibility in any legal proceedings), any media used to download information from the hard drive must be prepared in accordance with the following procedures:

* Any media used for downloading must be identified by a unique mark.
* Before use, any media used for downloading must be cleaned of any previous recording.
* The System Manager will register the date and time of downloaded media insertion, including its reference.
* Downloaded media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If the download media 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 and signed by the System Manager, then dated and returned to the evidence store.
* If downloaded media is archived the reference must be noted.
* If downloaded media is put onto a device, the device will be encrypted and password protected.

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager or the school senior leadership team. If there is a possibility that one of these individuals may be called as a witness to an offence where the data may be used as evidence, if possible that person should not view the data until asked to do so by the police. A record will be maintained of the viewing or release of any download media to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the downloaded media (and any images contained thereon) remains the property of the school and that downloaded media (and any images contained thereon) are to be treated in accordance with Data Protection legislation.

The school also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of downloaded media this will be produced from the secure evidence store, complete in its sealed bag.

The police may require Focus 1st Academy to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until they are needed by the police. Applications received from outside bodies (e.g. solicitors or parents) to view or release images will be referred to the Head Teacher and a decision made by a member of the senior leader of the school in consultation with the DPO.

Complaints about the use of CCTV

Any complaints in relation to the school’s CCTV system should, in the first instance, be addressed to the Head Teacher of Focus 1st Academy.

Request for access by the data subject

The Data Protection Act provides Data Subjects (those whose image has been captured by the CCTV system and can be identified) with a right to data held about themselves, including those obtained by CCTV. Requests for such data should be made to the relevant school office who will inform the ITNDM.