


Policy document control box	
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Overview

Red Balloon Educational Trust (RBET) has in place a CCTV surveillance system, "the system", solely on premises at Red Balloon of the Air's (RBAir) site in Milton, Cambridge and at RBET Aylesbury. Images are monitored and recorded centrally and will be used in strict accordance with this policy.

The Head of Sustainability and Development has initial responsibility for the operation of the system and for ensuring compliance with this policy and the procedures documented. In the absence of the Head of Sustainability and Development this responsibility transfers to the RBET DPO.

United Kingdom General Data Protection Regulations (UK GDPR): CCTV digital images, if they show a recognisable person, are personal data and are covered by the UK GDPR. This Policy is associated with the RBET Data Protection Policy, the provisions of which should be adhered to at all times.

1. The system

The system comprises of:

- RBAir: Two cameras, an online portal for accessing recordings, and CCTV recording signs.
- RBET Aylesbury: Four cameras, an online portal for accessing recordings, and CCTV recording signs.

Cameras will be located at strategic points around the site, principally at the main entrance and alternative entry points at the property. No camera will be hidden from view. A list of locations is given in Appendix 1.

Signs will be prominently placed at strategic points and at entrance and exit points of the site to inform staff, visitors, and members of the public that a CCTV installation is in use.

Although every effort has been made to ensure maximum effectiveness of the system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

2. Purpose of the system

The system has been installed by RBET with the primary purpose of reducing the threat of crime generally, protecting the premises and helping to ensure the safety of all staff, learners and visitors, consistent with respect for the individuals' privacy. These purposes will be achieved by monitoring the system to:

- Deter those having criminal intent
- Assist in the prevention and detection of crime
- Facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order
- Facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against staff and assist in providing evidence to managers and/or to a member of staff against whom disciplinary or other action is, or is threatened to be taken
- Facilitate the movement of vehicles on site
- In the case of staff to provide management information relating to employee compliance with contracts of employment
- Safeguard learners, staff and visitors when in attendance on site

The system will not be used:

- To provide recorded images for the world-wide-web.
- To record sound other than in accordance with the policy on covert recording.

3.1 Covert recording

Covert cameras may be used under the following circumstances on the written authorisation or request of the DPO, and where it has been assessed by the DPO;

- That informing the individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording; and
- That there is reasonable cause to suspect that unauthorised or illegal activity is taking place or is about to take place.

Any such covert processing will only be carried out for a limited and reasonable time period, consistent with the objectives of making the recording and will only relate to the specific suspected unauthorised activity.

The decision to adopt covert recording will be fully documented and will set out how the decision to use covert recording was reached and by whom.

3. Monitoring of images

Images captured by the system will be recorded twenty-four hours a day throughout the whole year. The recordings are accessed from a web interface which is protected with a login and only accessible on-site or via our VPN.

No unauthorised access to the recordings will be permitted at any time. Authorised access will be strictly limited to those listed as Relevant Persons, police officers and any other person with statutory powers of entry. Heads of Centre/Headteachers are only permitted to the CCTV footage for their own Centre, not for other RBET sites included within this policy.

An audit log is maintained within the CCTV system for all users who have accessed the system including time and date of access, details of what content has been viewed and amendments to settings. The audit log is used only to ensure no unauthorised or unnecessary monitoring occurs, to protect the privacy of all members of the RBET community including visitors.

Individuals including visitors may be granted access to the CCTV recordings on a case-by-case basis and only then with written authorisation. The viewable footage will be limited to ensure necessity and proportionality of the access and must be approved by a Relevant Person. In an emergency and where it is not reasonably practicable to secure prior authorisation, access may be granted to persons with a legitimate reason if authorised by the DPO.

Before allowing access to any recordings, staff will satisfy themselves of the identity of any visitor and that the visitor has appropriate authorisation. All visitors will be required to complete and sign the visitors' log, which shall include details of their name, their department or organisation they represent, the person who granted authorisation and the timeframe of footage viewed.

5. Staff

All staff will be made aware of the sensitivity of handling CCTV images and recordings. The Head of Sustainability and Development will ensure that all staff are fully briefed and trained in respect of the functions, operations and administration related to the use of CCTV.

Training in the requirements of the UK GDPR will be given to all those by the DPO.

6. Recording

Digital recordings are made in real time, operating 24 hours a day, 7 days a week.

Images will normally be retained for 90 days from the date of recording, and then automatically overwritten. Once a hard drive has reached the end of its use it will be erased prior to disposal and recorded on the relevant Disposal Log.

All hard drives and recorders shall remain the property of RBET until disposal and

destruction. Destruction will take place via secure disposal.

7. Access to Images

All access to images will be recorded in the Data Subject Access Request Log by the DPO.

Access to images will be restricted to those staff need to have access in accordance with the purposes of the system. See Relevant Persons for a list of such staff.

Access to images by third parties: Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following authorities:

- Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder
- Prosecution agencies
- Relevant legal representatives
- The media where the assistance of the general public is required in the identification of a victim of crime or the identification of a perpetrator of a crime
- People whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings.
- Emergency services in connection with the investigation of an accident.

7.1 Access to images by a data subject

CCTV digital images, if they show a recognisable person, are personal data and are covered by the UK GDPR. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Regulations. They do not have the right of instant access.

A person whose image has been recorded and retained and who wishes access to the data must apply in writing using RBET's Data Subject Access Request form, detailing the footage required. A response will be provided promptly and in any event within 1 month of receiving the request. Please see the RBET Data Subject Access Request Policy.

The UK GDPR gives the organisation the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.

If it is decided that an individual's request is to be refused, the reasons will be fully documented and the data subject informed in writing within 1 month, stating the reasons.

8. Complaints

It is recognised that some Data Subjects may have concerns or complaints about the operation of the system. Any complaint should be addressed in the first instance to

the Head of Sustainability and Development and will be handled in alignment with the RBET Complaints and Grievance Policy. Concerns or enquiries relating to the provisions the UK GDPR may also be addressed to the DPO. These rights do not alter the existing rights of anyone under any relevant grievance or disciplinary procedures.

9. Data Breach

A “Personal Data Breach’ means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed”

In the event that a data breach occurs, a thorough assessment of the breach will be made immediately by the DPO as well as any other relevant employees.

Immediate steps will be taken to ensure that the breach is contained and the effects of the breach minimised and mitigated as much as possible.

If the data breach is deemed by the DPO reportable to the Information Commissioner’s Office, the ICO will be notified within 72 hours of the discovery of the breach. The ICO can be informed via their website at: <https://ico.org.uk/for-organisations/report-a-breach/> or by telephone: 0303 123 1113.

In the case of a serious breach, Data Subjects whose data has been affected will be notified, in writing.

10. Compliance monitoring

The contact point for staff or members of the public wishing to enquire about the system will be Head of Sustainability and Development.

Upon request, enquirers will be provided with:

- A copy of the RBET CCTV policy
- A copy of the RBET Data Subject Access Request policy, with reference to the request form if required or requested
- A copy of the RBET Complaints and Grievance Policy

All documented procedures will be kept under review and a report periodically made to RBET Trustees regarding the volume of access.

The effectiveness of the system in meeting its purposes will be kept under review and reports submitted as required to RBET Trustees.

Appendix 1

Camera No.	Location	Type
RBAir		

1	Car Park Entrance	External, Ubiquiti G4 Dome, Night Vision, Sound
2	Rear Car Park, Covers Garden Access	External, Ubiquiti G4 Dome, Night Vision, Sound
RBET Aylesbury		
1	Alleyway	External, UniFi UVC G5 Pro, Night Vision, Sound
2	Back Garden	External, UniFi UVC G5 Pro, Night Vision, Sound
3	Car Park	External, UniFi UVC G5 Pro, Night Vision, Sound
4	Front of Building	External, UniFi UVC G5 Pro, Night Vision, Sound