

Ormiston Academies Trust

Wodensborough Ormiston Academy CCTV policy

Policy version control

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Author	Alexandra Coughlan Data Protection and Complaints Manager Kevin Oldman Regional Estates Manager – South and East
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Description of changes	<ul style="list-style-type: none">Changes detailed in appendix 3

Contents

1. Introduction	3
2. Legal framework	3
3. Definitions	4
4. Roles and responsibilities	4
5. Purpose and justification	4
6. Protocols	5
7. Code of practice	5
8. Right of Access	6
Appendix 1.....	8
9. Roles and Responsibilities	8
10. Signage	8
11 Security.....	9
12 Privacy by design.....	9
13 Access	10
14 Authorised Users	10
Appendix 2 List of cameras	12
Appendix 3.....	20

1. Introduction

- 1.1. At Ormiston Academies Trust (referred to as “the Trust” and any or all its academies), we take our responsibility towards the safety of staff, visitors and pupils very seriously. To that end, we use surveillance cameras to monitor for the safety and wellbeing of students, staff and visitors.
- 1.2. The purpose of this policy is to manage and regulate the use of the surveillance and CCTV systems at the Trust’s Academies and ensure that:
 - The images captured are being handled in accordance with data protection legislation as set out under UK GDPR
 - The images that are captured are useable for the purposes we require them for.
- 1.3. This policy covers the use of surveillance and CCTV systems which capture moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes:
 - Observing what an individual is doing to ensure safety of students, staff and visitors
 - Taking action to prevent a crime
 - Using images of individuals that could affect their privacy

2. Legal framework

- 2.1. This policy has due regard to legislation including, but not limited to, the following:
 - The Protection of Freedoms Act 2012
 - The UK General Data Protection Regulation
 - The Data Protection Act 2018
 - The Freedom of Information Act 2000
 - The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
 - The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
 - The School Standards and Framework Act 1998
 - The Children Act 1989
 - The Children Act 2004
 - The Equality Act 2010
- 2.2. This policy has been created with regard to the following statutory and non-statutory guidance:
 - Amended surveillance camera code of practice 2021
 - ICO (2022) ‘Guide to the UK General Data Protection Regulation (UK GDPR)’
 - ICO (2017) ‘In the picture: A data protection code of practice for surveillance cameras and personal information’

3. Definitions

- 3.1. For the purpose of this policy a set of definitions will be outlined, in accordance with the surveillance code of conduct:
- Surveillance – monitoring the movements and behaviour of individuals; this can include video, audio or live footage. For the purpose of this policy only video and audio footage will be applicable.
 - Overt surveillance – any use of surveillance for which authority does not fall under the Regulation of Investigatory Powers Act 2000.
 - Covert surveillance – any use of surveillance which is intentionally not shared with the subjects it is recording. Subjects will not be informed of such surveillance.
- 3.2. The Trust does not condone the use of covert surveillance when monitoring the academy's staff, pupils and/or volunteers.
- 3.3. Any overt surveillance footage will be clearly signposted around the academy.

4. Roles and responsibilities

- 4.1. Ormiston Academies Trust, as the corporate body, is the data controller. The CEO of the Trust therefore has overall responsibility for ensuring that records are maintained, including security and access arrangements in accordance with regulations, however this will be delegated to Principals.
- 4.2. The Data Protection Officer for the Trust is responsible for providing advice and guidance on any potential risks to the rights and freedoms of individuals.
- 4.3. The Data Protection Lead deals with the day-to-day matters relating to data protection.

5. Purpose and justification

- 5.1. The purpose of CCTV monitoring is to deter crime and to protect the safety and property of the academy. Safety and security purposes include, but are not limited to:
- 5.2. Protection of individuals, including students, staff and visitors;
- 5.3. Protection of academy-owned and/or operated property and buildings, including equipment, building perimeters, entrances and exits, lobbies and corridors, and internal spaces;
- 5.4. Verification of alarms and access control systems;
- 5.5. Patrol of common areas and areas accessible to the public
- 5.6. Investigation of criminal activity, safeguarding incidents and serious disciplinary activity.
- 5.7. The lawful bases we rely on to process CCTV footage are:

Article 6 (1) (e) Processing is necessary to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law. Our basis in law is set out in:

- Section 175 of the Education Act 2002
- the Education (Independent School Standards) Regulations 2014
- the Non-Maintained Special Schools (England) Regulations 2015
- the Education and Training (Welfare of Children) Act 2021
- Keeping Children Safe in Education 2021
- the Health and Safety at Work etc Act 1974

Article 6 (1) (f) the processing is necessary for our legitimate interests unless there is a good reason to protect the individual's personal data which overrides those legitimate interests

6. Protocols

- 6.1. The surveillance system will be registered with the ICO in line with data protection legislation.
- 6.2. The surveillance system is a closed system which must not have the option to record sound enabled.
- 6.3. Warning signs have been placed throughout the premises where the surveillance system is active, as mandated by the ICO's Code of Practice. See section 7 for additional information.
- 6.4. The surveillance system has been designed for maximum effectiveness and efficiency; however, the academies cannot guarantee that every incident will be detected or covered and 'blindspots' may exist.
- 6.5. The surveillance system will not be trained on individuals unless an immediate response to an incident is required.
- 6.6. The surveillance system will not be trained on private vehicles or property outside the perimeter of the academy.

7. Code of practice

- 7.1. The Trust understands that recording images of identifiable individuals constitutes as processing personal information, so it is done in line with data protection principles.
- 7.2. The Trust notifies all pupils, staff and visitors of the purpose for collecting surveillance data via a privacy notice which will be displayed on notice boards and on individual academy websites
- 7.3. CCTV cameras are only placed where they do not intrude on anyone's privacy and are necessary to fulfil their purpose.
- 7.4. All surveillance footage will be kept for up to six months for security purposes; the principal and the Data Protection Lead are responsible for keeping the records secure and allowing access.
- 7.5. The academy has a surveillance system for the purpose of the prevention and detection of crime and the promotion of the health, safety and welfare of staff, pupils and visitors.

- 7.6. The surveillance and CCTV system is owned by the academy and images from the system are strictly controlled and monitored by authorised personnel only. Please see appendix 1
- 7.7. The academy will ensure that the surveillance and CCTV system is used to create a safer environment for staff, pupils and visitors to the academy, and to ensure that its operation is consistent with the obligations outlined in data protection legislation.
- 7.8. The surveillance and CCTV system will:
- Be designed to take into account its effect on individuals and their privacy and personal data.
 - Be transparent and include a contact point, the DPL, through which people can access information and submit complaints.
 - Have clear responsibility and accountability procedures for images and information collected, held and used.
 - Only keep those images and information for as long as required after six months.
 - Restrict access to retained images and information with clear rules on who can gain access.
 - Consider all operational, technical and competency standards, relevant to the surveillance and CCTV system and its purpose, and work to meet and maintain those standards in accordance with the law.
 - Be subject to stringent security measures to safeguard against unauthorised access.
 - Be regularly reviewed and audited to ensure that policies and standards are maintained.
 - Only be used for the purposes for which it is intended, including supporting public safety, the protection of pupils, staff and volunteers, and law enforcement.
 - Be accurate and well maintained to ensure information is up-to-date.

8. Right of Access

- 8.1. Under the UK GDPR, individuals have the right to obtain confirmation that their personal information is being processed in line with the data protection principles.
- 8.2. All disks containing images belong to, and remain the property of, the trust.
- 8.3. Individuals have the right to submit a Subject Access Request (SAR) to gain access to their personal data in order to verify the lawfulness of the processing.
- 8.4. The academy will verify the identity of the person making the request before any information is supplied.
- 8.5. A copy of the information will be supplied to the individual free of charge; however, the academy may impose a 'reasonable fee' to comply with requests for further copies of the same information.
- 8.5.1. Where an SAR has been made electronically, the information will be provided in a commonly used electronic format.
- 8.5.2. Requests by persons outside the academy for viewing or copying disks, or obtaining digital recordings, will be assessed by the principal, who will consult the DPO, on a case-by-case basis with close regard to data protection and freedom of information legislation.
- 8.5.3. Where a request is manifestly unfounded, excessive or repetitive, a reasonable fee could be charged *however*

- 8.5.4. Where a request is manifestly unfounded or excessive, the academy holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the ICO and to a judicial remedy, within one month of the refusal.
- 8.5.5. All fees will be based on the administrative cost of providing the information.
- 8.5.6. All requests will be responded to without delay and at the latest, within one calendar month of receipt.
- 8.5.7. In the event of numerous or complex requests, the period of compliance will be extended by a further two months. The individual will be informed of this extension and will receive an explanation of why the extension is necessary, within one month of the receipt of the request.
- 8.5.8. In the event that a large quantity of information is being processed about an individual, the academy will ask the individual to specify the information the request is in relation to.
- 8.5.9. It is important that access to, and disclosure of, the images recorded by surveillance and CCTV footage is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact, should the images be required for evidential purposes.
- 8.5.10. Releasing the recorded images to third parties will be permitted only in the following limited and prescribed circumstances, and to the extent required or permitted by law:
 - The police – where the images recorded would assist in a specific criminal inquiry
 - Prosecution agencies – such as the Crown Prosecution Service (CPS)
 - Relevant legal representatives – such as lawyers and barristers
 - Persons who have been recorded and whose images have been retained where disclosure is required by virtue of data protection legislation
- 8.6. Requests for access or disclosure will be recorded and the principal will make the final decision as to whether recorded images may be released to persons other than the police.
- 8.7. Due to differing timescales for retention of CCTV footage, it may not be possible to provide the requested footage as it may have been overwritten prior to the request being received.
- 8.8. The Data Protection Act 2018 that says a data controller does not have to comply with a SAR, if doing so means disclosing information which identifies another individual, except where the consent of that third party has been obtained OR where it is reasonable to comply without the consent of a third party. This could mean that it is not possible to comply with requests due to the inability to redact images of third parties successfully.

Appendix 1

9. Roles and Responsibilities

9.1. The role of the data controller includes:

- 9.1.1. Processing surveillance and CCTV footage legally and fairly.
- 9.1.2. Collecting surveillance and CCTV footage for legitimate reasons and ensuring that it is used accordingly.
- 9.1.3. Collecting surveillance and CCTV footage that is relevant, adequate and not excessive in relation to the reason for its collection.
- 9.1.4. Ensuring that any surveillance and CCTV footage identifying an individual is not kept for longer than is necessary.
- 9.1.5. Protecting footage containing personal data against accidental, unlawful destruction, alteration and disclosure – especially when processing over networks.

9.2. The role of the principal includes:

- 9.2.1. Meeting with the relevant project lead to decide where CCTV is needed to justify its means.
- 9.2.2. Conferring with the DPO with regard to the lawful processing of the surveillance and CCTV footage.
- 9.2.3. Complete a DPIA to ensure all risk have been identified and mitigated sufficiently.

9.3 The role of the DPO includes:

- 4.5.1 Monitoring legislation to ensure the academy is using surveillance fairly and lawfully.
- 4.5.2 Communicating any changes to legislation with the Trust.
- 4.5.3 Advising on the appropriate lawful basis for processing CCTV footage
- 4.5.4 Assisting with the completion of a DPIA
- 4.5.5 Assisting with the completion of a legitimate interests assessment where necessary

9.4 The role of the DPL includes:

- 9.4.1 Administering requests for CCTV footage
- 9.4.2 Ensuring records of all viewing requests are kept up to date
- 9.4.3 Ensuring footage is deleted in line with stated retention periods

10. Signage

10.1 The ICO confirm that for academies to ensure their CCTV in operation signs are GDPR compliant, they should:

- 10.1.1. Ensure signage is clear and visible, e.g. outdoor signs are not covered by overhanging branches.

- 10.1.2. Ensure signage is an appropriate size, e.g. if the CCTV is located near a drop off point it needs to be big enough for driver to see it from inside a car.
 - 10.1.3. Ensure, if it captures images outside the academy's site, signs are clearly displayed for pedestrians.
 - 10.1.4. Ensure staff know who to talk to if they get asked about the images captured on CCTV.
- 10.2 Furthermore, when creating CCTV in operation signs, the wording used must include:
- 10.2.1 The details of the organisation operating the system.
 - 10.2.2 The purpose of its use, e.g. crime prevention.
 - 10.2.3 Who to contact if individuals have any enquires pertaining to the images being captured by the CCTV, e.g. the data protection officer (DPO) or principal.

11 Security

- 11.1 Access to the surveillance system, software and data will be strictly limited to authorised operators and will be password protected.
- 11.2 The main control facility is kept secure and locked when not in use.
- 11.3 Surveillance and CCTV systems will be tested for security flaws once a month to ensure that they are being properly maintained at all times.
- 11.4 Surveillance and CCTV systems will not be intrusive.
- 11.5 Any unnecessary footage captured will be securely deleted from the academy's system.
- 11.6 Any cameras that present faults will be repaired as soon as possible to avoid any risk of a data breach.
- 11.7 Visual display monitors are located in secure areas where they cannot be overseen.
- 11.8 The ICO surveillance checklist will be completed annually and kept on file
- 11.9 When CCTV is viewed, downloaded or extracted from the system, a record will be made in the CCTV log which details time, date, reason, who the footage was shared with and in what format it was provided.

12 Privacy by design

- 12.1 The use of surveillance cameras and CCTV will be critically analysed using a Data Protection Impact Assessment (DPIA), in consultation with the DPO.
- 12.2 A DPIA will be carried out prior to the installation of any new surveillance and CCTV system.
- 12.3 If the DPIA reveals any potential security risks or other data protection issues, the academy will ensure they have provisions in place to overcome these issues.

- 12.4 Where the academy identifies a high risk to an individual's interests, and it cannot be overcome, the academy will consult the ICO before they use CCTV, and the academy will act on the ICO's advice.
- 12.5 The academy will ensure that the installation of the surveillance and CCTV systems will always justify its means.
- 12.6 If the use of a surveillance and CCTV system is too privacy intrusive, the academy will seek alternative provision.

13 Access

- 13.1 Options for responding where the academy does not have redaction technology could include:

Inviting the data subject and/or their representative in to view the footage while manually redacting third parties

Providing a still of the footage with third parties manually redacted

Obtaining consent from third parties

Refusing to comply with the request

14 Authorised Users

Staff members who are authorised to access and process data contained in the CCTV system and who have had appropriate training are:

	WOA	Mitie
Name	Leigh Moore	Names, training and job roles maintained by Mitie as part of the FM contract
Job Roles	Principal	
Name	Myk Wagstaff	
Job Roles	Vice Principal	
Name	Craig Smith	
Job Roles	Senior Assistant Principal – DSL-DPO	
Name	Antony Taylor	
Job Roles	Operations Manager	
Name	Wayne Jones	

Job Roles	Community Safeguarding	
Access Level (Full Admin, View, Copy, Live, etc.)	Full Access	Full access, admin, view, copy, live etc
Reason for access	<p>Investigation of Criminal Activity, Safeguarding Incidents and Serious Disciplinary Activity.</p> <p>Protection of Individuals, including Students, Staff & Visitors</p> <p>Protection of Academy Owned property and buildings including entrances and exits lobbies and corridors</p>	system PPM checks. Footage recovery upon request from Police or school SLT, investigation into building damage/security concerns
Cameras that can be accessed (Ref to camera list in Appendix 2)	All Camera Access – within the academy system – NOT Mitie FM system	All cameras within FM CCTV system – NOT Academy system

Appendix 2 List of cameras

Please list all cameras and locations

WOA

Camera Number	Location	All Live / Live & Record / Record
Vernon 1		
1	FM PE Student Toilet	Live and Record
2	Sports Hall	Live and Record
3	Sports Hall	Live and Record
4	Staircase 13	Live and Record
5	Outside Operations towards Science	Live and Record
6	Operations towards Cleaners	Live and Record
7	Dance Studio	Live and Record
8	Science 1 st Floor Circulation	Live and Record
9	Lobby Area 1 st Floor by Bridge	Live and Record
10	Science 1 st Floor Towards Lobby	Live and Record
11	Toilet	Live and Record
12	Top Staircase 11	Live and Record
13	External Towards Student Gate	Live and Record
14	Reception Area	Live and Record
15	Top of Admin Office	Live and Record
16	Reception Area	Live and Record
17	G.F. Circulation	Live and Record
18	Bottom of Admin Office	Live and Record
19	FM Toilet	Live and Record

20	G.F. Circulation	Live and Record
21	G.F. Circulation	Live and Record
22	G.F. Circulation	Live and Record
23	Bottom Staircase 11	Live and Record
24	Top Lobby L2-021	Live and Record
25	PE Entrance by Lift	Live and Record
26	Bottom Staircase 13	Live and Record
27	PE Circulation by Changing Rooms	Live and Record
28	PE Towards Sports Hall	Live and Record
29	Male Toilets	Live and Record
	4 Blank Screens	
Vernon 2		
1	Front External PE Entrance	Live and Record
2	External Side to PE Entrance	Live and Record
3	External Reception Entrance Gates	Live and Record
4	External Drive Entrance	Live and Record
5	External PE Cage Area	Live and Record
6	Conference Room	Live and Record
7	External Drive onto Site	Live and Record
	10 Blank Screens	
South 1		
1	External Back Lockley to North	Live and Record
2	Top LRC Stairs	Live and Record
3	G.F. Girls Toilet	Live and Record
4	G.F. Boys Toilet	Live and Record

5	External Back South to Rebound Wall	Live and Record
6	South Foyer	Live and Record
7	1 st Floor S20 Staff Toilets	Live and Record
8	In Space to S20 Staff Toilets	Live and Record
9	Link Bridge	Live and Record
10	Design Studio	Live and Record
11	Circulation From Resources to Arena	Live and Record
12	Stairs to S15	Live and Record
13	External South to Lockley Cage	Live and Record
14	G.F. Lobby by Lift	Live and Record
15	Rebound Wall Cycle Rack	Live and Record
16	Outside P.A. Staff Base	Live and Record
17	Arena Circulation	Live and Record
18	Snack Shack Area	Live and Record
19	Top S15 Staircase	Live and Record
20	S15 Lobby	Live and Record
21	S18 Lobby	Live and Record
22	1 st AD&T Staff Base	Live and Record
23	Cycle Racks	Live and Record
24	Between South & Vernon	Live and Record
25	South Top Exit Looking to North	Live and Record
26	Top Music Circulation	Live and Record
27	Textiles Hub	Live and Record
28	1 st South Staff Toilet Area	Live and Record
29	South Compound	Live and Record

30	Arena	Live and Record
31	LRC	Live and Record
32	Exams Office to AD&T Hubs	Live and Record
IP		
10.03.30.208	External South Foyer Down Drive	Live and Record
	3 Blankl Screens	
North 1		
1	External Towards Back Gate	Live and Record
2	1 st Floor by Balcony	Live and Record
3	Top Staircase 1	Live and Record
4	1 st Floor Student Toilets	Live and Record
5	G.F. Boys Toilets	Live and Record
6	G.F. DWC & Girls Toilets	Live and Record
7	Humanities Pod Area	Live and Record
8	Bottom Staircase 1	Live and Record
9	Top of Staircase by Lift	Live and Record
10	Language Corridor	Live and Record
11	Bottom Lift Lobby Area	Live and Record
12	Team Ambition Open Area	Live and Record
13	External Back Lockley to South	Live and Record
14	External Field to Basketball Court	Live and Record
15	External Towards South	Live and Record
16	Maths Home Base	Live and Record
17	Open Space by N1	Live and Record
18	External Dining Room Entrance	Live and Record

19	Outside N4	Live and Record
20	Inside N1 (I.E.)	Live and Record
21	Doors from Lift into Maths	Live and Record
22	N3 Towards Student Toilets	Live and Record
23	External Looking at Shed	Live and Record
24	Dining Room Entrance	Live and Record
25	North Assembly Point	Live and Record
26	North Looking at South Entrance	Live and Record
27	Sports Field	Live and Record
28	Outside N17 to Balcony	Live and Record
29	Underpass	Live and Record
30	External Field Towards Basketball Court	Live and Record
31	Staircase Behind Lift	Live and Record
IP - 32	Girls Canteen Toilet	Live and Record
IP - 33	Boys Canteen Toilet	Live and Record
	3 Blank Screens	
Lockley 1		
1	Boys/Girls Toilet	Live and Record
2	1 st Floor Lift	Live and Record
3	New Domestic Unit	Live and Record
4	External Between Lockley and North	Live and Record
5	Top Stairs	Live and Record
6	1 st Towards Fire Exit	Live and Record
7	G.F. Towards Fire Exit	Live and Record
8	Lobby Area	Live and Record

9	G.F. Lift Area Towards Exit	Live and Record
10	External Path into Lockley	Live and Record
11	Between Lockley and North	Live and Record
	6 Blank Screens	
Harrison 1		
1	External Towards Assembly Point	Live and Record
2	External Towards North	Live and Record
3	A.R.C.	Live and Record
4	H3 Towards Toilets	Live and Record
5	1 st Floor Toilets	Live and Record
6	Top Dining Room	Live and Record
7	Bottom Dining Room	Live and Record
8	Car Park Entrance-Stairs	Live and Record
9	Meeting Area	Live and Record
10	Soft Seating Area	Live and Record
11	Assembly Point to Gate	Live and Record
	6 Blank Screens	

MITIE

Camera Number	Location	Live / Live & Record / Record
CH1	South external overlooking drive	Live and record
CH2	North block over looking near gate	Live and record
CH3	Rear car park post overlooking Harrison rear entrance	Live and record

CH4	North block overlooking back of Lockley block	Live and record
CH5	North block overlooking rear entrance opposite field	Live and record
CH6	Harrison block overlooking playground	Live and record
CH7	North block overlooking playground shelters	Live and record
CH8	North block overlooking FM office	Live and record
CH9	North block overlooking rear carpark and bin refuse	Live and record
CH10	South block opposite MUGA overlooking fire exit	Live and record
CH11	South LRC side overlooking drive	Live and record
CH12	South block overlooking north side entrance	Live and record
CH13	South block overlooking rear of Lockley block	Live and record
CH14	Post mounted overlooking far gate in-between south and Vernon	Live and record
CH15	Post mounted overlooking LRC side entrance to south block	Live and record
CH1	North block lift foyer	Live and record
CH2	North block L2-452 circulation	Live and record
CH3	North block L1-420 circulation	Live and record
CH4	PRU foyer entrance	Live and record
CH5	Dining hall	Live and record
CH6	Kitchen circulation L1-300B	Live and record
CH7	South foyer north side	Live and record
CH8	South block LRC foyer	Live and record
CH9	South block foyer Vernon side	Live and record
CH10	South block link bridge doors	Live and record
CH11	Lockley block disabled toilet	Live and record
CH12	Lockley ground floor lift door	Live and record
CH13	Lockley entrance foyer	Live and record

CH14	Post mounted overlooking rear Harrison entrance on rear carpark	Live and record
CH15	Rear car park overlooking disabled parking spaces	Live and record

Appendix 3

Old Section	New Section	Change
1	1	GDPR changed to UK GDPR
2	2	2.1 removed reference to RIPA General data protection regulation changed to UK..... 2.2 Home Office (2013) 'The Surveillance Camera Code of Practice' Changed to Amended surveillance camera code of practice 2021 ICO (2017) 'Overview of the General Data Protection Regulation (GDPR)' changed to ICO (2022) 'Guide to the UK General Data Protection Regulation (UK GDPR)' ICO (2017) 'Preparing for the General Data Protection Regulation (GDPR) 12 steps to take now' removed
3	3	3.2 'covert surveillance will only be operable in extreme circumstances' removed
4	4	4.1 Academy name changed to Ormiston Academies Trust Principal changed to CEO...however this is delegated to Principals 4.2 DPO role included 4.3 now DPL role Original 4.3 and 4.4 now moved to appendix 1 section 9
5	5	5.7 lawful bases added
6		removed
7		removed
8	6	6.2 now says 'must not have the option to record sound enabled'
9		Appendix 1 Section 10
10		Appendix 1 section 11
11		Appendix 1 section 12
12	7	7.2 now says via a privacy notice 7.4 school to complete retention period
13	8	8.1 changed to UK GDPR

		8.7 new section 8.8 new section
Appendix 1	Appendix 1	9.4 added in 10 added in 11 schools to complete highlighted sections 12 added in 13 added in
Appendix 2	Appendix 2	Removed reference to covert cameras