



## CCTV Policy

July 2024

### SECTION 1: Policy statement

- 1.1 We use CCTV cameras to view and record individuals on and around the School site in order to maintain a safe environment for pupils, staff and visitors, and to protect school property. This policy relates to the use and management of CCTV throughout the school premises and should be read alongside our Data Protection Policy and Data Retention Schedule.
- 1.2 We recognise that the images of individuals recorded by CCTV cameras are personal data which must be processed in accordance with applicable Data Protection Legislation as well as the Information Commissioner's Office (ICO) CCTV guidance relating to the use of video surveillance. As a data controller, we have notified our use of personal data (which includes CCTV) with the ICO and seek to comply with its best practice guidance.
- 1.3 We take compliance with this policy very seriously. Failure to comply puts at risk the individual's whose information is being processed, carries the risk of significant civil and criminal sanctions for the individual and for us, and may, in some circumstances, amount to a criminal offence by the individual. As a result, breach of this policy may be treated as a disciplinary matter and, following investigation, may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

### SECTION 2: Reason for the policy

The purpose of this policy is to:

- 2.1 Outline why and how we will use CCTV, and how we will process data recorded by CCTV cameras;
- 2.2 Ensure that the legal rights of staff, relating to their personal data, are recognised and respected;
- 2.3 Assist staff in complying with their own legal obligations when working with personal data. In certain circumstances, misuse of information generated by CCTV or other surveillance systems could constitute a criminal offence; and
- 2.4 Explain how to make a subject access request in respect of personal data created by CCTV.

### SECTION 3: Scope and Application

#### 3.1 Objectives of the System

- 3.1.1 We have considered and determined that the purposes for which CCTV is deployed are legitimate, reasonable, appropriate and proportionate. Its purpose is in order to:



- deter crime and assist in the prevention and detection of crime and/or serious breaches of policies and procedures;
- protect buildings and assets from damage, disruption, vandalism and other crime;
- assist with the identification, apprehension and prosecution of offenders;
- for the personal safety of pupils, staff, visitors and other members of the public;
- assist in day-to-day management, including ensuring the health and safety of staff and others;
- assist internal investigations; and

3.1.2 The CCTV system will not be used to:

- record sound unless in accordance with the policy on covert recording (see below)
- for any automated decision taking; or
- monitoring private and/or residential areas or premises.
- Before installing and using CCTV systems on our premises, we have:
- assessed and documented the appropriateness of and reasons for using CCTV;
- established and documented who is responsible for day-to-day compliance with this policy; and
- ensured signage is displayed to inform individuals that CCTV is in operation, and that CCTV operations are covered in appropriate policies.

3.1.3 Once installed, reviews will be regularly undertaken to ensure that the use of CCTV systems and the processing of personal data obtained through it remains justified.

## **SECTION 4: Procedures**

### **4.1 Positioning**

- 4.1.1 Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.
- 4.1.2 Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.
- 4.1.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- 4.1.4 No images of public spaces will be captured except to a limited extent at site entrances.
- 4.1.5 As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property



## **4.2 Maintenance**

- 4.2.1 The CCTV System will be operational 24 hours a day, every day of the year.
- 4.2.2 The System Manager (defined below) will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
- 4.2.3 The System will be checked and (to the extent necessary) serviced no less than annually.

## **4.3 Supervision of the System**

- 4.3.1 Staff authorised by the School to conduct routine supervision of the System may include the Operations Manager, day or night security and relevant staff on duty.
- 4.3.2 Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

## **4.4 Storage of Data**

- 4.4.1 The day-to-day management of images will be the responsibility of the Chief Operating Officer who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.
- 4.4.2 Images will be stored for 4 weeks, and automatically over-written unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.
- 4.4.3 Where such data is retained, it will be retained in accordance with the Act and our Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded in the system log book.
- 4.4.4 Images and recording logs must be retained and disposed of in accordance with the Data Protection Policy. Images stored on removable media will similarly be erased or destroyed once the purpose of the recording is no longer relevant. Data will only be retained for legal and/or compliance reasons in accordance with the relevant Data Protection Policy/Data Retention Schedule.
- 4.4.5 In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the data, where it is possible to do so.

## **4.5 Access to Images (see Appendix A for Access Request Form)**

- 4.5.1 Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).



- 4.5.2 Individuals also have the right to access personal data the School holds on them (please see the Data Protection Policy), including information held on the System, if it has been kept. The School will require specific details including at least to time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.
- 4.5.3 The System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV images:
- Where required to do so by the Head, the Police or some relevant statutory authority;
  - To make a report regarding suspected criminal behaviour;
  - To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
  - To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian will be informed as part of the School's management of a particular incident;
  - To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 6.2 above;
  - To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
  - In any other circumstances required under law or regulation.
- 4.5.4 Where images are disclosed under (see above) a record will be made in the system log book including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).
- 4.5.5 No images from our CCTV cameras will be disclosed to any other third party, without express permission being given by the Chief Operating Officer. Data will not normally be released unless satisfactory evidence is given that it is lawful to do so, eg. when it is required for legal proceedings or under a court order.
- 4.5.6 In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.
- 4.5.7 We will maintain a record of all disclosures of CCTV footage, including the location to which the footage are being transferred to (if footage/images are being removed from the CCTV system), any crime incident number (if applicable) and the signature/written confirmation of receipt of the person to whom the images have been transferred.
- 4.5.8 No images from CCTV will ever be made public (including posting online) or disclosed to the media.



#### **4.6 Other CCTV systems**

- 4.6.1 The School does not own or manage third party CCTV systems, but may be provided by third parties with images of incidents where this is in line with the objectives of the School's own CCTV policy and/or its school rules.
- 4.6.2 Many pupils travel to School on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The School may use these in establishing facts in cases of unacceptable pupil behaviour, in which case the parents/guardian will be informed as part of the School's management of a particular incident.

#### **4.7 Subject Access Requests**

- 4.7.1 Data subjects, including staff, may make a request for disclosure of their personal information and this may include CCTV images (**subject access request**). A subject access request should be made in writing in accordance with our Data Protection Policy and Staff Privacy Notice (available within the Staff Handbook) and it will be handled in line with data protection law and the School's applicable policies and procedures.
- 4.7.2 In order for us to locate relevant footage, any requests for copies of recorded CCTV images should normally include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual (e.g. what they were wearing).
- 4.7.3 We may be required or permitted to obscure images of third parties (i.e. other individuals) when disclosing CCTV or other footage as part of a subject access request. We may also offer for you to view the footage on school premises if appropriate.
- 4.7.4 If we cannot comply with the request, the reasons for not being able to comply will be documented and the data subject will be advised of these in writing.

#### **4.8 Requests to Prevent Processing**

- 4.8.1 We recognise that, in certain circumstances, we may be required to stop processing personal data, if an individual requests it. Under data protection law individuals also have other legal rights with respect to their data as listed and set out in the Staff Privacy Notice. For further information regarding this, please contact the [Data Protection Lead/ Officer].]

#### **4.9 Complaints and queries**

- 4.9.1 Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Chief Operating Officer.



#### 4.10 Enforcement and Compliance

- 4.10.1 All authorised users of our surveillance technology and its underlying data are required to adhere to the controls around the use of CCTV as set out in this policy and as may be advised separately from time to time. The use of the CCTV systems for any other purpose other than those specifically authorised will be subject to a full investigation and could lead to disciplinary action up to and including dismissal without notice.
- 4.10.2 The misuse of our surveillance systems and unauthorised use of images and CCTV footage may constitute a criminal offence.
- 4.10.3 Any concerns regarding the use of CCTV should be shared with the Chief Operating Officer

**Simon Holmes**  
Chief Operating Officer

<b>Responsible and Accountable Persons</b>	<b>Name</b>	<b>Position</b>
Responsible	Simon Holmes	
Accountable	Simon Holmes	
Date Policy Approved	July 2024	
Review Period	Three years	
Review Date	July 2027	

<b>Version History</b>	<b>Amendment Date</b>	<b>Amended by Whom</b>	<b>Previous Version Stored Where (if Applicable)</b>
Previous version	May 2018	William Hawkes	Policy Archive Folder



Appendix A

**CCTV FOOTAGE ACCESS REQUEST**

The following information is required before the school can provide copies of or access to CCTV footage from which a person believes they may be identified.

Please note that CCTV footage may contain the information of others that needs to be protected, and that the school typically deletes CCTV recordings after a 4 week period.

<b>Name and address:</b> (proof of ID may be required)	
<b>Description of footage (including a description of yourself, clothing, activity etc.)</b>	
<b>Location of camera</b>	
<b>Date of footage sought</b>	
<b>Approximate time (give a range if necessary)</b>	

Signature\*: .....

Print Name: .....

Date: .....

**\* NB if requesting CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 or over, the child's authority or consent must be obtained except in circumstances where that would clearly be inappropriate and the lawful reasons to provide to the parent(s) outweigh the privacy considerations of the child.**