

CCTV Policy



Review Date

March 2023

Ratified

15 March 2023

Next Review

March 2027

Responsible Directorate

Operations

Our Vision



Transforming Lives of our learners

We seek to ensure that all our learners receive a high-quality education from expert staff and aspire to achieve the best they possibly can, no matter their background or ability. Our learners have safe, supportive learning environments in which they develop, grow, and challenge themselves. We are determined that our learners will receive the very best enrichment and opportunities to help them reach their full potential and ensure they are prepared for the future, wherever it might take them.



Transforming Lives of our colleagues

Our colleagues are supported with the very best professional development through our innovative ATT institute, allowing them to stay focused on learning and developing as practitioners whilst they progress in their careers. We share the very best practice across our community of academies to help build systems and processes that really work.



Transforming Lives in the communities we serve

We are committed to actively engaging with and addressing inequality in our local areas. We understand that every one of our academies and their diverse communities are different, so we aim to build a supportive, collaborative, and nurturing relationship with each whilst sharing our key values across our Trust.

**Commitment
to Education**

**Transparency
and Integrity**

**Innovation and
Improvement**

**Dedication to
Inclusivity**

Our Values

Commitment to Education

Our core purpose is to positively impact the lives of all our learners. Education will always be at the heart of everything we do.

Transparency and Integrity

We are proud of our success whilst being open and honest about our areas for improvement. Our actions are always ethical and in the best interests of all our stakeholders.

Innovation and Improvement

We are committed to innovative education- always moving forward and never standing still. Our learners are ambitious and prepared for a future that is constantly changing and developing.

Dedication to Inclusivity

Our learners are all different and all important to us. We aspire to support, challenge, and help each one of them reach their full potential, regardless of their background or level of ability.

Contents

1	Introduction	4
2	Scope and Purpose of this Policy	4
3	Siting of Cameras	4
4	Privacy Impact Assessment	5
5	Management and Access	5
6	Storage and Retention of Images	6
7	Disclosure of Images to Data Subjects	6
8	Disclosure of Images to Third Parties	7
9	Misuse of CCTV Systems	8
10	Complaints Relating to this Policy	8
	Appendix 1- CCTV Privacy Impact Template	9

1 | Introduction

- 1.1 Our Trust uses Closed-Circuit Television (CCTV) for the following purposes:
- Providing a safe and secure environment for pupils, staff, and visitors
 - Preventing loss of, or damage to, the academy's buildings and/or assets
 - Assisting in the prevention of crime and assisting law enforcement agencies in apprehending offenders

2 | Scope and Purpose of this Policy

- 2.1 The purpose of this policy is to set out the position of the Trust on the management, operation, and use of the CCTV at our academies.
- 2.2 This policy applies to all members of our Workforce, visitors to academy premises, and all other persons whose images may be captured by the CCTV system.
- 2.3 This policy takes account of all applicable legislation and guidance, including:
- General Data Protection Regulation (GDPR)
 - Data Protection Act 2018 (together the Data Protection Legislation)
 - CCTV Code of Practice produced by the Information Commissioner
 - Human Rights Act 1998

3 | Siting of Cameras

- 3.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils, and visitors.
- 3.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The academy will make all reasonable efforts to ensure that areas outside of the academy premises are not recorded.
- 3.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.

- 3.4 Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms.

4 | Privacy Impact Assessment

- 4.1 Prior to the installation of any CCTV camera or system, a privacy impact assessment will be conducted by the academy to ensure that the proposed installation is compliant with legislation and ICO guidance.
- 4.2 The academy will adopt a *privacy by design* approach when installing new cameras and systems, taking into account the purpose of each camera to avoid recording and storing excessive personal data.

5 | Management and Access

- 5.1 The CCTV system will be managed by an individual with appropriate seniority who is designated by the Principal.
- 5.2 On a day-to-day basis, the CCTV system will be operated by the IT Department.
- 5.3 Access to live CCTV images will be restricted to individuals given permission by the Principal to do so.
- 5.4 No other individual will have the right to view or access any CCTV images, unless in accordance with the terms of this policy on the disclosure of images.
- 5.5 The CCTV system is checked regularly by the IT technician to ensure that it is operating effectively.

6 | Storage and Retention of Images

- 6.1 Images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.
- 6.2 Recorded images are stored only for a period of 7-28 days, depending on the capacity of the system. Some footage may be retained for longer if it records a specific incident.
- 6.3 The academy will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. These measures include:
- CCTV recording systems being located in restricted access areas
 - The CCTV system being encrypted or password protected
 - Restricting the ability to make copies of recordings to specified members of staff
- 6.4 A log of any access to the CCTV images will be maintained by the academy, including time and dates of access and a record of the individual accessing the images.

7 | Disclosure of Images to Data Subjects

- 7.1 Any individual recorded in any CCTV image is a **data subject** for the purposes of the Data Protection Legislation. Data subjects have a right to request access to images they are recorded in.
- 7.2 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such requests should be considered in the context of our Trust's Freedom of Information Policy.
- 7.3 When a request is made, the designated staff member will review the CCTV footage of relevant time periods in accordance with the request.
- 7.4 If the footage contains **only** the individual making the request, the individual may be permitted to view the footage. This must be strictly limited to that footage which contains **only** images of the individual making the request. The academy must take appropriate measures to ensure that the footage is restricted in this way.
- 7.5 If the footage contains images of other individuals, the academy must consider whether:

- The request requires the disclosure of images of individuals other than the requester, e.g., the images can be distorted so as not to identify other individuals
- The other individuals in the footage have consented to the disclosure of the images or if their consent could be obtained
- If neither of the above can be achieved, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

7.6 A record must be securely kept of all disclosures, which sets out:

- When the request was made
- The process used to determine whether the images contained third parties
- The considerations as to whether to allow access to those images
- The individuals that were permitted to view the images and when they did so
- Whether a copy of the images was provided. If so, the record must state to whom, when, and in what format.

7.7 If the requester agrees to viewing the images only, a permanent copy does not need to be provided to them. However, if a permanent copy is requested, this should be provided unless to do so is not possible (such as in relation to third party data that it would be unreasonable to disclose) or would involve disproportionate effort.

8 | Disclosure of Images to Third Parties

8.1 The academy will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

8.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

8.3 If a request is received from a law enforcement agency for disclosure of CCTV images, the academy must follow the same process as above in relation to subject access requests. Details should be obtained from the law enforcement agency regarding the exact purposes the CCTV images are needed for as well as any individuals of concern. This enables proper consideration to be given to what should be disclosed and the potential disclosure of any third-party images.

8.4 The information above must be recorded in relation to any disclosure.

- 8.5 If an order is granted by a Court for disclosure of CCTV images, this should be complied with. However, very careful consideration must be given to exactly what the Court order requires. If there are any concerns regarding the disclosure, the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

9 | Misuse of CCTV Systems

- 9.1 The misuse of CCTV system may constitute a criminal offence.
- 9.2 Any member of staff who breaches this policy may be subject to disciplinary action.

10 | Complaints Relating to this Policy

- 10.1 Any complaints relating to this policy or to the CCTV systems operated by our academies should be made in accordance with our Complaints Policy.

Appendix 1- CCTV Privacy Impact Assessment Template

<p>Who will be captured on CCTV?</p>	<p>[Pupils, staff, parents / carers, volunteers, Governors and other visitors including members of the public etc]</p>
<p>What personal data will be processed?</p>	<p>[Facial Images, behaviour, sound, etc]</p>
<p>What are the purposes for operating the CCTV system?</p> <p>Set out the problem that the academy is seeking to address and why the CCTV is the best solution and the matter cannot be addressed by way of less intrusive means.</p>	<p>[Prevention or detection of crime etc]</p>
<p>What is the lawful basis for operating the CCTV system?</p>	<p>[Legal Obligation, legitimate interests of the organisation to maintain health and safety and to prevent and investigate crime]</p>
<p>Who is/are the named person(s) responsible for the operation of the system?</p>	
<p>Describe the CCTV system, including:</p> <ul style="list-style-type: none"> • How this has been chosen to ensure that clear images are produced so that the images can be used for the purpose for which they are obtained • Siting of the cameras and why such locations were chosen • How cameras have been sited to avoid capturing images which are not necessary for the purposes of the CCTV system • Where signs notifying individuals that CCTV is in operation are located and why those locations were chosen • Whether the system enables third party data to be redacted, for example via blurring of details of third party individuals. 	

Set out the details of any sharing with third parties, including processors	[Police, subject access, etc. Careful consideration should be given to whether any provider is used in relation to the CCTV system and the access they might have to images. Will those processors send this data outside of the EEA, for example for storage in a cloud based system?]
Set out the retention period of any recordings, including why those periods have been chosen	
Set out the security measures in place to ensure that recordings are captured and stored securely	
What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?	<p>For example:</p> <ul style="list-style-type: none"> • Is it fair to record them in the way proposed? • How is the amount of data processed to be minimised? • What are the risks of the system being accessed unlawfully? • What are the potential data breach risks? • What are the risks during any transfer of recordings, or when disclosed to third parties such as the police?
What measures are in place to address the risks identified?	
Have parents and pupils where appropriate been consulted as to the use of the CCTV system? If so, what views were expressed and how have these been accounted for?	
When will this privacy impact assessment be reviewed?	
Approval- This assessment was approved by the Data Protection Lead:	
DPL: [Name]	Date: [00.00.00]