

Proposal to add this appendix to the Trust Data Protection policy, from September 2024.

Appendix 2: CCTV policy

Introduction

Academies use closed circuit television (CCTV) in various locations around the school premises to ensure it remains safe in accordance with the Information Commissioners Office (ICO) guidance for the use of CCTV. [Video surveillance \(including guidance for organisations using CCTV\) | ICO](#)

The CCTV system is used to help safeguard students, staff, parents, carers, volunteers and members of the public whilst on school premises and aims to protect against crime.

This policy outlines the Trust's use of CCTV and associated images and its compliance with the Data Protection Act 2018.

Functionality

The CCTV system comprises of a number of fixed, Pan, Tilt Zoom (PTZ) and dome cameras, of which, some have sound recording capability.

The CCTV system is owned and operated by the Trust or shared ownership with the building owner.

CCTV is monitored from a secure internet connection and can be accessed by a limited number of authorised staff as defined by the Principal.

The introduction of, or changes to CCTV monitoring will be subject to consultation with the Head of IT (functionality) and the DPO (Data Protection Impact Assessment).

Siting the Cameras

Cameras will be sited so they only capture images (and sounds, where applicable) relevant to the purposes for which they are installed (Objectives of the CCTV system) and care will be taken to ensure that reasonable privacy expectations are not violated.

The academy will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act 2018.

The academy will make every effort to position cameras so that their coverage is restricted to the academy premises, which may include outdoor areas. This may include corridors, playgrounds, social areas, dining halls and school gates.

CCTV will not be installed in mainstream classrooms, but may be used in Reset, Alternative Provision, Technical/IT and SEN rooms.

CCTV will NOT be used inside toilet cubicles, changing areas or intimate care facilities.

The academy must maintain a record of where cameras are situated, when CCTV footage is viewed, along with a list of authorised users.

Objectives of the CCTV system

- To safeguard students, staff and visitors whilst on the school premises;
- To prevent and detect loss or damage to academy buildings and their assets;
- To provide a safe and secure environment for students, staff and visitors;
- To protect members of the public, private property and staff;
- To assist in managing the site;
- To uphold behaviour expectations;
- To advance investigations that the Trust is required to undertake in furtherance of a legal or policy obligation.

Statement of intent

The academy will treat the CCTV system and all information, documents and recordings obtained and used as data, which are protected by the Data Protection Act 2018, in the strictest of confidence.

CCTV cameras will be used to monitor activities around public areas and surrounding grounds of the school site, to identify criminal activity actually occurring, anticipated, or perceived, for the purpose of securing the safety and well-being of all parties.

CCTV images captured may be used when applying the academy's student behaviour policy, staff discipline or grievance procedures, as required. For these purposes, CCTV footage or hard copy images may be shown to parties involved and will be subject to the usual confidentiality requirements of those procedures.

Images will only be released to the Police for use in the detection or prevention of crime and with the consent of the Principal or Data Protection Officer or deputies in their absence.

The planning and design of the CCTV layout has endeavoured to ensure that the scheme will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Security cameras are clearly visible and accompanied by prominent signs informing that CCTV is in use, making it clear where individuals are being recorded. Signs will contain details of the purpose for using CCTV in areas where CCTV is in operation, at the entrance and within the controlled area.

Operation of the system

The scheme will be managed by the school Principal, in accordance with the principles and objectives expressed in this policy.

The day to day management will be the responsibility of the Office/ Operations Manager. The control panel will only be used by the Office/ Operations Manager and the Principal or deputies in their absence.

The CCTV system will be in continuous operation.

Monitoring CCTV operation

The Operations Manager is responsible for ensuring that all cameras are functional, and the system is recording. Schedule of which should be no less than once a month.

Visitors and contractors wishing to access the CCTV system or recording system for installation or maintenance will be subject to the arrangements outlined below.

Authorised operators of the CCTV system must satisfy themselves that the identity of anyone to have access to the CCTV system and the purpose of the access. Where any doubt exists over the grounds for access, permission will be refused, and advice sought.

Those authorised with access to images are aware of the procedures that need to be followed when accessing the recorded images. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images, as outlined in this policy.

Covert Monitoring

The academy may in exceptional circumstances set up covert monitoring. For example:

- i. Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- ii. Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation **MUST** be obtained from the DPO who can be contacted at dpo@astreaacademytrust.org.

Covert monitoring must cease following completion of an investigation. A mobile camera may be used in this instance.

Cameras sited for the purpose of covert monitoring will NOT be used in areas which are reasonably expected to be private, for example toilet cubicles and changing areas.

Maintaining CCTV Records Procedures

In order to maintain and preserve the integrity of the media used to record CCTV:

All images are recorded in the Trust data storage cloud and retrieved by the IT team, only where due cause is justified. There is no systematic live monitoring, but images may be observed live where necessary.

Viewing recorded CCTV footage must be kept to a minimum by designated operators as defined by the Principal, by way of the authorised user list.

The IT Team is responsible for maintaining authorised user accounts at the request of the Operations Manager or delegated deputy(ies), for access to the CCTV system and for providing in-house training for CCTV system users.

Access to CCTV footage must be recorded by the academy, to include date, time, nature of incident, purpose of viewing and name of viewer, either through the CCTV system where functionality allows or by electronic form log.

Storage and Retention of CCTV images

While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. All retained data will be stored securely.

CCTV footage will be retained only as long as is necessary, for a minimum period of five calendar days and a maximum period of forty five days. Unless it is footage which relates to an incident under review, this can be extracted by authorised users and held for a specific purpose.

Where CCTV footage is to be kept for longer than usual, this must be logged by the academy, to include date, time, nature of incident and purpose for retainment and location of where footage is stored.

Requests to view footage from the Police

A record will be maintained of the release of records to the Police or other authorised applicants. Viewing of records by the police must be recorded by the academy. Requests by the police can be made under *Schedule 2.2(i) Crime and taxation: general* of the Data Protection Act 2018 and UK GDPR. Information may be shared with police where appropriate consent is given or to safeguard individuals.

Should a record be required as evidence, a copy may be released to the police under the procedures described in this policy. IT should provide this on request by the Principal. Records will only be released to the police on the clear understanding that the record remains the property of the school, and both the record and information contained on it are to be treated in accordance with this code. The school also retains the right to refuse permission for the police to pass on the record or any part of the information contained therein to any other person.

The police may require the school to retain the stored records for possible use as evidence in the future. Such records will be properly indexed and securely stored until they are needed by the police.

Subject Access Requests (SARs)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act 2018.

All requests should be submitted for the attention of the Principal. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified and specify a date range, time and location.

The academy will endeavour to respond to requests within ONE MONTH of receiving the written request.

In response to SARs the academy may arrange for the requester to view CCTV footage on the school premises. Still images in hard copy or electronic format may be shared with the requester, providing the identity of other individuals is protected in line with data protection principles.

The academy reserves the right to refuse access to CCTV footage where legal exemptions apply; In such cases where disclosure could identify other individual(s) or could prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

Where images of other individuals are present in CCTV footage, these may not be disclosable due to the obligation to protect the confidentiality of other individuals. In these circumstances, the exemption applied here is under the Data Protection Act 2018 is Schedule 2, Part 3.16: Protection of the rights of others.

Access to and disclosure of CCTV Images to third parties

Applications received from outside agencies (e.g. solicitors) to view or release CCTV records will be referred to the Data Protection Officer. Charges may be made to cover the costs of producing the material where it is deemed excessive.

Any request from a third party should be made to the Principal and will be formally recorded as an SAR. Request must include reasons for the request and any other relevant information, such as a crime incident number.

Access to recorded images should be minimal and will be restricted to those staff authorised to view them and will not be made more widely available.

Any enquiries about the CCTV system should be directed to the Operations Manager.

Any requests for disclosure of CCTV footage should be directed to the Data Protection Lead.

Breaches of the code (including breaches in security)

Any breach of this policy by school staff will be initially investigated by the Principal, in order for appropriate disciplinary action to be considered.

Any serious breach of the Code of Practice will be immediately investigated by the Principal or nominated deputy and recommendations made on how to remedy the breach.

Complaints

Any complaints about the school's CCTV system should be in writing and addressed to the Principal or, where the complaint is about a Principal, to the Regional Director.

Complaints will be investigated in accordance with the Schools Complaint policy.

Further Information and links to other policies

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice 2022 (published by the Information Commissioners Office)
- www.ico.gov.uk

- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018
- UK GDPR
- Astrea Data Protection policy
- Human Rights Act 1998.
- Equality Act 2010.
- Protection of Freedoms Act 2012.

Academies to log electronically

Viewing CCTV footage log

Academy name

Date of viewing

Time of viewing

Name of person/people viewing CCTV footage

Description of incident (What does the footage show)

Reason for viewing (e.g. behaviour/safeguarding/staff conduct/premises)

Footage retained **YES/NO**

If YES, Location of CCTV footage held

*In the event CCTV images are retained for longer than usual period of retention, please complete next set of questions...

Reason for extended retention of CCTV footage

Authorised by

Location of CCTV footage held

Date CCTV footage is scheduled to be deleted

Date CCTV footage was deleted.