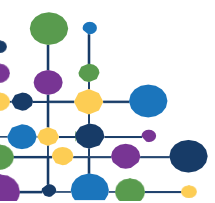


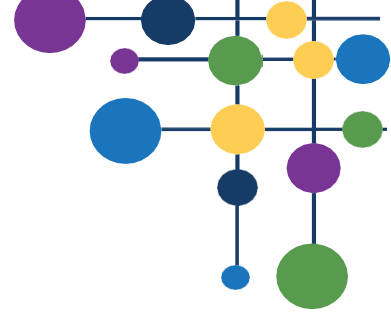


CCTV POLICY & PROCEDURE

MAT Version	1.0
Name of policy writer	Debbie Howard
Last updated	February 2019
Review date	February 2020
Approved by Directors	12 February 2019

Record of Alterations
Version 1.0 Original





SHARE MAT Policy for CCTV

The purpose of this policy is to regulate the management and operation of the closed circuit television (CCTV) system within SHARE MAT schools (the **MAT**). It also serves as a notice and a guide to data subjects (including pupils, parents, employees, volunteers, governors, visitors to the schools and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the **system**).

The system is administered and managed by the MAT, who act as the data controller. This policy will be subject to review from time to time, and should be read with reference to the MAT's GDPR Policy. For further guidance, please review the Information Commissioner's CCTV Code of Practice and General Data Protection Regulations (the **Act**).

All fixed cameras are in plain sight on the MAT's premises and the MAT does not routinely use CCTV for covert monitoring or monitoring of private property outside the school grounds.

The purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the MAT believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

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Section 1 Objectives of the System

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- To support the management of safeguarding on school grounds.
- To protect the school buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders or vehicles.
- To provide evidence of damage or loss to the MAT's insurance company.
- To monitor the security and integrity of the school sites and deliveries and arrivals.
- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the Behavior Policy, which is available to parents and pupils on each individual school's website or on request.

Section 2 Positioning

- Locations have been selected, both inside and out, that the MAT reasonably believes require monitoring to address the stated objectives.



- Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area.
- No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- No images of public spaces will be captured except to a limited extent at site entrances and around teaching buildings.

Section 3 Maintenance

- The CCTV system will be operational 24 hours a day, every day of the year.
- The IT Manager will check and confirm that the system is properly recording and that cameras are functioning correctly, on a regular basis.
- The system will be checked and (to the extent necessary) serviced regularly.

Section 4 Supervision of the System

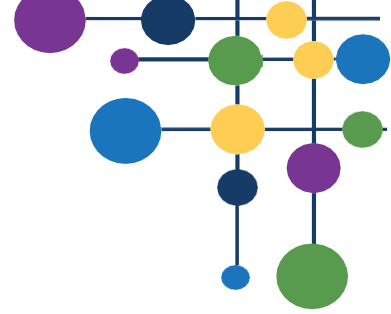
- Employees authorised by the MAT to conduct routine supervision of the system may include members of the SLT, IT technicians and supervisors at the sports centres.
- Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

Section 5 Storage of Data

- The day-to-day management of images will be the responsibility of the IT Manager, or such suitable person as the IT Manager shall appoint in their absence.
- Images will be stored for two weeks, and automatically over-written unless the MAT 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.
- Where such data is retained, it will be retained in accordance with the Act and the MAT's GDPR 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.

Section 6 Access to Images

- Access to stored CCTV images will only be given to authorised persons, under the supervision of the IT Manager, Data Protection Officer or Designated Safeguarding Lead in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
- A request to view footage must be made by a senior member of staff to the IT Manager, Data Protection Officer, Designated Safeguarding Lead or a designated person in their absence.
- Downloading of the footage must only be carried out by the IT Manager, Data Protection Officer or Designated Safeguarding Lead.
- The footage must be viewed in the presence of the IT Manager, Data Protection Officer, Designated Safeguarding Lead or a designated person in their absence.
- Individuals also have the right to access personal data the schools hold on them (please see the GDPR Policy for details of the subject access request procedure), including information held on the system, if it has been kept. The MAT will require specific details including at least the 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.
- The Data Protection Officer 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 Data Protection Officer may authorise access to CCTV images:
 - Where required to do so by the headteacher, 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/carers will be informed as part of the school's management of a particular incident;



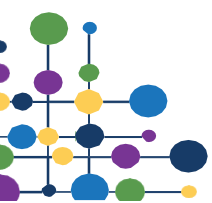
- To data subjects (or their legal representatives) pursuant to a subject access request under the Act;
- To the MAT's insurance company where required in order to pursue a claim for loss or damage to insured property; or
- In any other circumstances required under law or regulation.
- Where images are disclosed as detailed 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).
- Where images are provided to third parties under the above rights, wherever practicable steps will be taken to obscure images of non-relevant individuals.

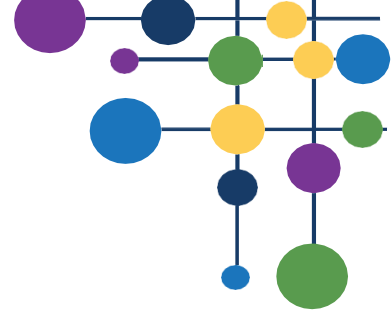
Section 7 Other CCTV Systems

- The MAT 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 MAT's own CCTV policy and/or its school rules.
- Many pupils travel on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The MAT may use these in establishing facts in cases of unacceptable pupil behaviour, in which case the parents/carers will be informed as part of the management of a particular incident.

Section 8 Complaints and Queries

Further questions about the MAT's CCTV system, or its use of CCTV, or requests for copies, should be referred to The Data Protection Officer, Beverley Stapleton. beverley.stapleton@sharemat.org





CCTV FOOTAGE ACCESS REQUEST

The following information is required before the MAT 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 MAT typically deletes CCTV recordings after a two week period.

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

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.

