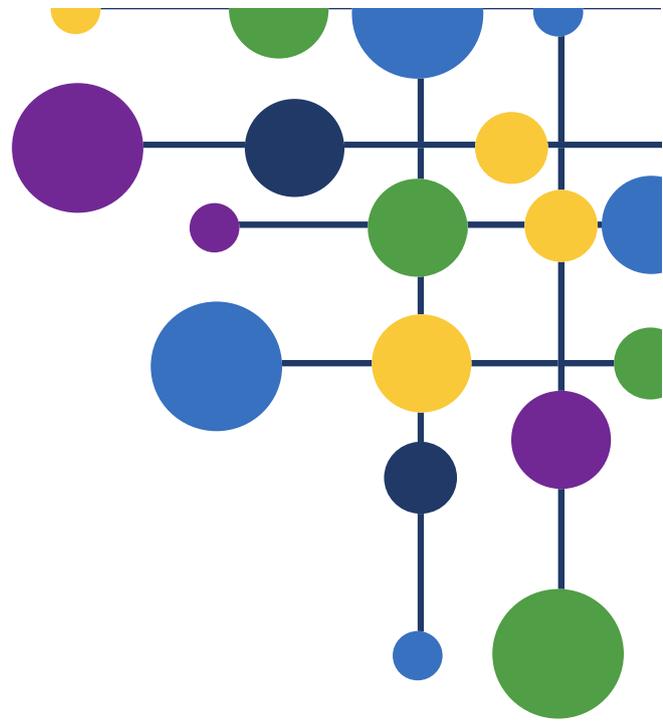




**SHARE**

MULTI-ACADEMY TRUST



# **CLOSED CIRCUIT TELEVISION (CCTV) POLICY**

**CCTV POLICY TO BE USED ACROSS ALL SCHOOLS  
WITHIN THE MAT**

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## **1. OVERVIEW**

SHARE MAT uses Close Circuit Television (“CCTV”) at several of its academies. The purpose of this policy is to set out the position of the trust as to the management, operation and use of the CCTV across all its sites. This policy applies to all members of staff across the trust, visitors to the individual schools and all other persons whose images may be captured by the CCTV system.

This policy takes account of all applicable legislation and guidance, including:

- The Data Protection Act (2018) and the UK General Data Protection Regulation (“GDPR”)
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998

## **2. PURPOSE**

The trust uses CCTV for the following purposes:

- to provide a safe and secure environment for students, members of staff and visitors;
- to prevent the loss of or damage to the trust’s buildings and/or assets; and
- to assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.

## **3. DESCRIPTION OF SYSTEM**

Those academies who use CCTV have fixed and moving cameras on sites. Cameras are not equipped for sound recording.

## **4. SITING OF THE CAMERAS**

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.

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 trust will make all reasonable efforts to ensure that areas outside of the schools’ premises are not recorded.

Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.

## **5. PRIVACY IMPACT ASSESSMENT**

Prior to the installation of any new CCTV camera, or system, a privacy impact assessment will be conducted by the trust to ensure that the proposed installation is compliant with legislation and ICO guidance.



The trust and academies within will adopt a privacy by design approach when installing new cameras and systems, considering the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

## **6. MANAGEMENT AND ACCESS**

On a day-to-day basis the CCTV will be operated by members of staff in the academies with delegated authority as appropriate.

The viewing of CCTV images will be restricted to senior members of staff with explicit powers to view images i.e., the Headteacher or Headteacher delegate. Access will be overseen by the ICT Team, the Premises & Compliance Manager or Designated Safeguarding Lead (DSL).

No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy with reference to disclosure of images.

Permissible access will include:

- requirement of the Headteacher, the Police or relevant public authority
- required to support or make a report regarding criminal behaviour
- required to support the DSL examine behaviour that may be of concern
- required to assist the school in cases of poor/unacceptable behaviour
- a legitimate Subject Access Request
- a request by the trust's insurance company to support a claim for loss or damage to insured property
- otherwise required to do so by law or regulation

The CCTV system should be checked weekly by the appropriate members of staff in school to ensure that it is operating effectively.

## **7. STORAGE AND RETENTION OF CCTV IMAGES**

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

Recorded images should only be stored for a period of fourteen days unless there is a specific reason why they are retained for a longer period.

The trust will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place will include:

- CCTV recording systems being in restricted access areas;
- the CCTV system being encrypted/password protected; and
- restriction of the ability to make copies to specified members of staff.



A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, should be maintained within each academy.

## **8. DISCLOSURE OF IMAGES TO DATA SUBJECTS**

Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation and has a right to request access to those images.

Any individual who requests access to images of themselves will be considered to have made a subject access request in accordance with the Data Protection Legislation. Such a request should be considered in the context of the trust's GDPR Policy.

When such a request is made the appropriately nominated representative will review the CCTV footage in accordance with the request.

If the individual making the request is the only person in the footage, then he/she may be permitted to view it. The viewing must be strictly limited to the specific footage which contains only images of the individual making the request. The nominated representative must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals, then the trust will consider whether:

- the images can be distorted so as not to identify the other individuals;
- the other individuals in the footage have consented to the disclosure of the images.

If neither is possible, the trust will consider whether it is otherwise reasonable in the circumstances to disclose the images to the individual making the request.

A record must be kept, and held securely, of all requests for disclosures which sets out:

- when the request was made;
- the process followed by the nominated person in determining whether the images contained images of third parties;
- the considerations as to whether to allow access to those images;
- the names of the individuals who were permitted to view the images and when;
- whether a copy of the images were provided, and if so to whom, when and in what format.

## **9. DISCLOSURE OF IMAGES TO THIRD PARTIES**

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



If a request is received from a law enforcement agency for disclosure of CCTV images the nominated person must follow the same process as the one for subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third-party images. A record must be kept of any disclosure of CCTV images made to third parties.

If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However, very careful consideration must be given to exactly what the Court order requires. If there are any doubts as to disclosure, then the trust's Data Protection Officer should be contacted (see below) in the first instance and appropriate legal advice may be sought.

## **10. MISUSE OF CCTV SYSTEM**

The misuse of CCTV systems could constitute a criminal offence. Any member of staff who breaches this policy and procedure may be subject to disciplinary action.

## **11. CONTACT**

Subject Access Requests relating to CCTV footage should be made using the form at Appendix A and submitted to the Data Protection Officer.

### **Data Protection Officer**

Jayne Newson

[Jayne.newson@sharemat.co.uk](mailto:Jayne.newson@sharemat.co.uk)

01484 868777



## 12.APPENDIX A

### CCTV Subject Access Request Form

<b>Name:</b>	
<b>Date of request:</b>	
<b>Home address:</b>	
<b>Phone number:</b>	
<b>Email address:</b>	

<b>Description of footage:</b> <i>Please include as much information as you can as this will help us locate the footage</i>	
<b>Identifiers:</b> <i>Clothes, hats, shoes, bags, behaviour to look out for</i>	
<b>School:</b>	
<b>Location of camera:</b> <i>Whereabouts was the camera in the school</i>	
<b>Date of incident:</b>	
<b>Time of incident:</b>	
<b>Time range/ length of incident:</b> <i>Length of footage that you are requesting</i>	

Signature: \_\_\_\_\_ Name: \_\_\_\_\_

\* A person with parental responsibility must sign on behalf of those individuals who are under the age of 13.