



SHARE

MULTI-ACADEMY TRUST

CLOSED CIRCUIT TELEVISION (CCTV) POLICY

CCTV POLICY TO BE USED ACROSS ALL SCHOOLS WITHIN THE MAT

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Name of policy writer	Debbie Howard
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1.OVERVIEW

SHARE MAT aim to ensure that the trust and all of the schools within the trust are fully compliant in outline the processes, management, storage, retention and erasure of closed circuit television (CCTV).

SHARE MAT aim to use this policy 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 on an annual basis, and should be read with reference to the MAT's GDPR Policy, and all other supporting policies and documents.

For further guidance, please review the Information Commissioner's CCTV Code of Practice and General Data Protection Regulations (the Act). Further information on this can be found in *Section 15, Appendix C* of this policy.


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.

SHARE MAT believes these purposes are all comply with lawful processing legislation and act within the legitimate interest of the data subjects. Data captured for the purposes below will not be used for any commercial purpose or any other purposes not outlined within the policy.

2.OBJECTIVES

Please see below the detailed objectives that SHARE MAT wish to meet by using CCTV systems across the trust:

- To protect pupils, staff, volunteers, visitors and members of the public in relation to their personal safety
- To support the management of safeguarding the grounds of all of the schools across the trust
- To protect the schools building and equipment from any damage or harm
- To protect the personal property of staff, pupils, volunteers and members of the public from any damage or harm
- To support the police and local community in preventing and detecting crime, and assist in the identification and apprehension of any offenders or vehicles related to crime
- To provide evidence of any damage or loss to the MAT's insurance company

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- To monitor the security and integrity of the school sites deliveries and arrivals
 - To monitor staff, contractors and visitors of the site when carrying out work
 - To monitor and uphold discipline among pupils in line with the Behaviour and Anti-Bullying Policies used across the trust, which are both available to parents and pupils on each school's individual website, or on request

3.STATEMENT OF INTENT

SHARE MAT operates CCTV cameras across each of the schools within the trust. To view a map of CCTV cameras and where they are placed please contact our Compliance and Data Protection Officer, details can be found on *Section 12* of this policy. Each school operates a range of fixed CCTV cameras and dome CCTV cameras dependant on the placement and range required to be covered by that camera.

SHARE MAT issue warning signs where CCTV is in operation that are clearly labelled to all visitors of the school. These signs can be found on all external entrances to the schools, including gates and outdoor areas.

SHARE MAT outline the use of CCTV within our privacy notices (SHARE MAT have three privacy notices, all of which include a use of CCTV section) in order to be transparent and open with the collection, storage and use of CCTV images.

The planning, design and placement of CCTV cameras across each schools has been endeavoured to ensure the maximum effectiveness of capturing risk, incidents and accidents across the trust.

4.SITING OF THE CAMERAS

SHARE MAT always ensure that the privacy of all data subject across the trust is central to the placement of all cameras in each school. SHARE MAT acknowledge that under the GDPR, data subjects are entitled to their privacy, therefor when sites are chosen for placement, a Data Protection Impact Assessment is undertaken to assess that the privacy of personal data is kept intact.

CCTV cameras will not be positioned in areas deemed heightened privacy areas, such as changing rooms and wash rooms. This is done to protect the personal privacy of all staff, students, volunteers, contractors and visitors of each school.

SHARE MAT will make every effort to ensure that placement of all external cameras are restricted to covering only school premises and do not overlook areas frequently used by the general public. Public spaces will only be captured when site entrances are covered under the scope of CCTV cameras.

CCTV will not be used in any classrooms across the trust, unless stated otherwise. SHARE MAT may use CCTV to monitor any high value areas, such as IT suites, to protect the items housed in this area. SHARE MAT may also use



CCTV in high risk areas of the schools, such as isolation, to protect the staff and pupils working in a high risk area.

All CCTV cameras are documented on a map and are accessible to any data subject by submitting a subject access request form to the Data Protection Officer. SHARE MAT will comply with the GDPR legislation and respond to all data subjects within the timeframe outlined within the legislation. To submit a subject access request please see *Section 8* of this policy.

5.MAINTENANCE

SHARE MAT ensure that all CCTV cameras and operating systems are subject to regular maintenance to ensure effective use. Please see below the maintenance operations of CCTV across the trust:

- The CCTV system will be operational for 24 hours a day, every day of the year
- The IT Manager/ Technician based at each school will ensure that each system is correctly recording and functioning on a regular basis
- All CCTV systems will be subject to annual maintenance

6.COVERT MONITORING

SHARE MAT may set up covert monitoring of our premises in exceptional circumstances. This process may only be done if:


- Authorised by Senior Management
- Required for assistance in an upcoming/ ongoing investigation
- There is probable cause to suspect illegal or unauthorised actions are taking place on school property
- A DPIA has been undertaken to ensure that areas deemed 'private' are not being monitored

Once an investigation has concluded, covert monitoring will cease to be in use.

7.STORAGE AND RETENTION OF CCTV IMAGES

The day-to-day management of CCTV images is the responsibility of the IT team. The IT Team will ensure the management of all CCTV systems follow the storage and retention guidelines stated below:

- All CCTV images will be retained for a minimum of two weeks (unless SHARE MAT require images to support an investigation, or are required to do so by a third party such as the police or local authority)
- When images are retained they are subject to an assessment of lawfulness (SHARE MAT will assess if we feel we have a lawful basis to retain the data for longer than stated) all of this will be documented in a Data Protection Impact Assessment

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- All CCTV images will be automatically overwritten and therefore deemed correctly erased, this will be overseen by the IT team
 - All CCTV images will be stored on a secure server held on site at each school, this will be managed by the IT team

8.ACCESS TO CCTV IMAGES

SHARE MAT, in line with the GDPR legislation, will ensure that access to all CCTV images is restricted to essential personnel only. Access will be overseen, assessed and monitored by the IT team, Compliance Officer and Safeguarding Lead based at the school.

A request to view CCTV footage must be approved by a Senior Member of staff, Data Protection Officer or Safeguarding lead. An assessment will be undertaken by the Data Protection Officer to mitigate any risk by allowing access to this personal data and recorded in a log (including times, dates, names...)

When a request to view footage has been approved, footage must be viewed in the presence of the IT Manager, Data Protection Officer and Safeguarding lead. All of this information will be logged.

The Data Protection Officer will authorise, when appropriate, permitted access to view CCTV images if:

- Required to do so by the Head Teacher, the Police or relevant public authority
- Needed to support or make a report regarding criminal behaviour
- Needed to support safeguarding leads, examine behaviour that may be of concern
- Needed to assist the school on cases of poor/ unacceptable behaviour, in this incident, parents/carers/guardians will be informed as part of the school's management of incidents
- A legitimate Subject Access Request has been made
- SHARE MAT's insurance company request to support a claim for loss or damage to insured property
- Otherwise required to do so by law or regulation

A Data Protection Impact Assessment will be undertaken by the Data Protection Officer to ensure only those deemed essential personnel to processing will have access to CCTV imagery provided.

Data Subjects have the right to access their personal data, this is outlined in *Section 9*, subject access request and CCTV.



9.SUBJECT ACCESS REQUESTS AND CCTV IMAGES

As stated in the GDPR and Data Protection legislation, Data Subject have the right to access personal data. This can be done by submitted a Subject Access Request to SHARE MAT's Data Protection Officer.

When submitted a Subject Access Request to view CCTV images please use our Subject Access Request form, that can be downloaded from the SHARE MAT website, or the school's website. All relevant information needs to be included in a Subject Access Request (including names, times, dates, location).

In line with the legislation, SHARE MAT will process and respond to a Subject Access Request within the 30-day window provided by the ICO. If an extension is required by SHARE MAT this will be submitted within the original 30-day window to the data subject outlining the need for the extension.

All Subject Access Requests will be documented (including whom the request was from, dates and parties involved with processing) following the trusts Subject Access Request Policy.

Data Subjects may be subject to an administrative fee for the action of processing this request. This may be done when a request is classed as large scale processing. Data Subjects will be informed by the MAT if this fee applies.

When a Subject Access Request is submitted, the Data Protection Officer will assess there is a lawful basis for disclosing the CCTV footage to the Data Subject. When access is not permitted this will be outlined to the Data Subject along with a clear outline as to why SHARE MAT have not permitted access. SHARE MAT, will where possible, offer an alternative when access has been declined.

10.ACCESS AND DISCLOSURE TO THIRD PARTIES

SHARE MAT do not disclose personal recorded data to any person or organisation unless authorised to do so. SHARE MAT monitor personal recorded data sharing with third parties by issuing a Data Sharing Agreement, a clause within a contract that covers data sharing or for vital/ public interest. Data sharing is covered within SHARE MAT's GDPR Policy outlining our terms of use.

When a third party submits a request for access to personal recorded data, this will be assessed by the Data Protection Officer. The Data Protection Officer will then decide if the request is lawful, and the impact of disclosing personal data on other data subjects.

Personal recorded data may be used within the school's discipline and grievance procedures as and when required. If data subjects personal recorded data is planned to be shown to a third party to support an ongoing case, that cannot be redacted to protect their identity, all affected data subjects will be informed.



Any personal recorded data this is shared, or even assessed to be shared, will be logged within SHARE MAT's Subject Access Request Log (with times, dates and people involved).

11.OTHER CCTV SYSTEMS

SHARE MAT do not own or manage any form of third party CCTV systems. SHARE MAT may be provided with CCTV images by third parties in line with objectives of SHARE MAT's CCTV Policy and school procedures.

SHARE MAT may require third parties, such as external coach suppliers and local bus providers, to provide personal recorded images to support an on-going case, such as unacceptable pupil behaviour. The third party provider will have an existing data sharing agreement or equivalent in place with SHARE MAT. Parents/ Guardians/ Carers will be informed as part of the management process of any incidents.

12.CONTACT

If you have any questions or concerns regarding CCTV, personal recorded data or anything else concerning recorded images, please feel free to contact our CCTV management team.

If you wish to submit a Subject Access Request concerning CCTV, please use the form listed under appendix A and submit it to the Data Protection Officer.

Data Protection Officer

Holly Senior

Holly.senior@sharemat.org

01484 868777

IT Manager

Zahid Iqbal

Zahid.iqbal@sharemat.org

13.COMPLAINTS

If you do not believe that SHARE MAT have handled your question or issue regarding CCTV correctly, you have the right to escalate this to the supervisory authority, The Information Commissioners Office.

Please see the contact details below:

14.APPENDIX A

If you wish to submit a Subject Access Request for CCTV footage, please complete the document provided below.

Please note that if you are requesting footage that may include others, this is subject to review from our Data Protection Officer. You will be informed if we are not able to provide you with the data and the reason for this.

Please note that SHARE MAT overwrite all CCTV footage every two weeks therefore we may not be able to provide you with CCTV footage if your request has been submitted after the two-week period.

CCTV Subject Access Request Form

Name:	
Date of submission:	
Home address:	
Phone number:	
Email address:	

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

Signature: _____ Name: _____



15. APPENDIX B

SHARE MAT acknowledge that it is a requirement under the GDPR and Data Protection legislation to notify anyone entering any of our schools when they are being recorded by CCTV cameras.

A CCTV sign should include:

- The area that is covered by that CCTV camera
- The purpose of the CCTV camera
- The name of the school
- Contact details for any enquiries



16. APPENDIX C

SHARE MAT adhere to and follow the guidance of:

- The General Data Protection Regulation (2018)
- The Data Protection Act (1998)
- CCTV Code of Practise (2014)
- Regulation of Investigatory Powers Act, RIPA (2000)

SHARE MAT use the guidance of the legislation listed above to write this policy and issue all of the relevant documents and templates to support out CCTV process and procedures.