



# CLOSED CIRCUIT TELEVISION (CCTV) POLICY

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

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Record of Alterations  
Version 1.0 Original  
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## **CONTENT:**

- 1. OVERVIEW**
- 2. PURPOSE**
- 3. DESCRIPTION OF SYSTEM**
- 4. SITING OF THE CAMERAS**
- 5. PRIVACY IMPACT ASSESSMENT**
- 6. MANAGEMENT AND ACCESS**
- 7. STORAGE AND RETENTION OF CCTV IMAGES**
- 8. DISCLOSURE OF IMAGES TO DATA SUBJECTS**
- 9. DISCLOSURE OF IMAGES TO THIRD PARTIES**
- 10. MISUSE OF CCTV SYSTEM**
- 11. CONTACT**
- 12. APPENDIX A- CCTV FOOTAGE ACCESS REQUEST FORM**



## **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 General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018 (together the ‘Data Protection Legislation’)
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998 This policy and procedure set out the position of the Academy Trust in relation to its use of CCTV.

## **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 Academy Trust buildings and/or assets; and
- to assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.

## **3.DESRIPTION 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.

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



## **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 will adopt a privacy by design approach when installing new cameras and systems, considering the purpose of each camera 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 academies with delegated authority as appropriate.

The viewing of CCTV images will be restricted to senior members of staff in academies with explicit powers to view images i.e. the Headteacher or Headteacher delegate. Access will be overseen by the ICT Team, Compliance Officer 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 and procedure as 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 (in this instance, parents/carers/guardians will be informed in line with the school's management of incidents)
- 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 systems should be checked weekly by the appropriate members of staff in academies 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 purpose for which 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 pursuant to 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 respect of relevant time periods where appropriate, in accordance with the request.

If the footage contains only the individual making the request, then 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 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 request requires the disclosure of the images of individuals other than the requester, for example whether 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 their consent could be obtained; or
- if not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

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

- when the request was made;
- the process followed by the nominated person in determining 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; and

- whether a copy of the images was 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.

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

If a request is received from a law enforcement agency for disclosure of CCTV images the nominated person must follow the same process as above in relation to 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.

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

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 concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

## **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**

Holly Senior

[holly.senior@sharemat.co.uk](mailto:holly.senior@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: \_\_\_\_\_

\*Requests made by a person over the age of 13 must sign for themselves. A person with parental responsibility must sign on behalf of those under the age of 13.

