

CCTV Policy

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| Version | Author | Date written | Approved | Note of Revisions |
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Contents

| | |
|--|---|
| 1. Introduction | 3 |
| 2. Statement of intent | 3 |
| 3. General overview..... | 4 |
| 4. Siting the cameras | 4 |
| 5. Covert monitoring | 4 |
| 6. Storage and retention of CCTV images | 5 |
| 7. Access to CCTV images..... | 5 |
| 8. Subject access requests (SAR) | 5 |
| 9. Access to and disclosure of images to third parties | 6 |
| 10. CCTV signage | 6 |
| 11. Security..... | 6 |
| 12. Complaints..... | 7 |
| Further information..... | 7 |
| Associated policies | 7 |
| APPENDIX ONE: CCTV Log..... | 8 |

1. Introduction

The purpose of this Policy is to regulate the review, management, operation and use of closed-circuit television (CCTV) across Yorkshire Causeway Schools Trust schools.

CCTV is in use to:

- increase personal safety of students, staff and visitors, and reduce the fear of crime
- monitor and minimise unauthorised and inappropriate vehicle access
- assist in managing the school
- protect the school buildings and their assets
- support the police in a bid to deter and detect crime
- assist in identifying, apprehending and prosecuting offenders
- protect members of the public and private property
- assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings
- determine the cause of accidents
- assist in the defense of any litigation proceedings

The CCTV System will not be used to:

- encroach on an individual's right to privacy
- monitor people in spaces where they have a heightened expectation of privacy (including toilets and changing rooms)
- follow particular individuals, unless there is an ongoing emergency incident occurring
- for commercial purposes
- pursue any other purposes than the ones stated above

The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

2. Statement of intent

The Trust and its schools comply with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published [here](#) and guidance [here](#).

The CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The system complies with the requirements of the Data Protection Act 2018 and UK GDPR.

In the unlikely event that the police request that CCTV footage be released to the media, the request will only be complied with when written authority has been provided by the police, and only to assist in the investigation of a specific crime.

3. General overview

Individual schools' systems comprise of a number of fixed and dome cameras.

These systems do not have sound recording enabled.

The CCTV systems are owned and operated by each individual school and their deployment is determined by the schools' leadership teams.

The CCTV system is accessible only by certain key staff with responsibility for security or behaviour.

The footage generated by the system should be of good enough quality to be of use to the police or the court in identifying suspects.

Any changes to CCTV monitoring will be subject to consultation with staff and the school community.

4. Siting the cameras

Cameras are sited so they only capture images relevant to the purposes for which they are installed, and care is taken to ensure that reasonable privacy expectations are not violated. The schools will ensure that the location of equipment is carefully considered to ensure that images captured comply with Data Protection regulations.

The schools will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

CCTV is not used in standard classrooms. It is, however, used to cover some communal spaces as well as the school exterior and grounds and the entrance to school buildings.

The planning and design endeavours to ensure the CCTV system gives 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.

Members of staff have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

5. Covert monitoring

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

- Where there is good cause to suspect that illegal or unauthorised action(s), are taking place, or where there are grounds to suspect serious misconduct;
- 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 Data Protection Officer, and a data protection impact assessment will be completed in order to comply with data protection law.

Covert monitoring must cease following completion of an investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example, toilets.

6. Storage and retention of CCTV images

Recorded data will not be retained for longer than is necessary. 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.

7. Access to CCTV images

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

The following members of staff have authorisation to access the CCTV footage:

- The headteacher
- Designated members of the senior leadership team
- The data protection officer
- The ICT system manager
- Anyone with express permission of the headteacher

Any individuals that access the footage must record their name, the date and time, and the reason for access in the access log – see Appendix One: CCTV log

Any visual display monitors will be positioned so only authorised personnel will be able to see the footage.

All authorised employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. These staff are trained in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

Any member of staff who misuses the CCTV system may be committing a criminal offence, and will face disciplinary action.

8. Subject access requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under GDPR.

All requests should be made in writing to the Data Protection Officer. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

Further information on subject access requests can be found in the Trust's Data Protection Policy.

As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and disclosure is unlikely. Refusal to disclose images may be appropriate where its release is:

- likely to cause substantial and unwarranted damage to an individual;
- to prevent automated decisions from being taken in relation to an individual;
- likely to prejudice the legal rights of individuals or jeopardise an ongoing investigation.

9. Access to and disclosure of images to third parties

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the police and service providers to the school where these would reasonably need access to the data (e.g. investigators).

Requests for access should be made in writing to the Headteacher and Data Protection Officer.

The data may be used within the school's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

The school will comply with any court orders that grant access to the CCTV footage. The school will provide the courts with the footage they need without giving them unrestricted access. The DPO will consider very carefully how much footage to disclose and seek legal advice if necessary.

The DPO will ensure that any disclosures that are made are done in compliance with UK GDPR. All disclosures will be recorded.

10. CCTV signage

It is a requirement of data protection regulations that people entering a CCTV protected area are notified that the area is monitored by CCTV and that pictures are recorded. The Trust will ensure that this requirement is fulfilled by the positioning of appropriate signs.

11. Security

The ICT system manager will be responsible for overseeing the security of the CCTV system and footage.

- Any faults in the system will be reported as soon as they are detected and repaired as soon as possible, according to the proper procedure
- Footage will be stored securely and encrypted wherever possible
- The CCTV footage will be password protected and any camera operation equipment will be securely locked away when not in use
- Proper cyber security measures will be put in place to protect the footage from cyber attacks
- Any software updates (particularly security updates) published by the equipment's manufacturer that need to be applied, will be applied as soon as possible

12. Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed, in the first instance, to the Headteacher at the school.

If this does not prove satisfactory, please refer to the Trust's Complaints Policy available on the Trust and school website.

If the issue remains unresolved, and the complainant considers that the school is not operating within the Code of Practice as issued by the Information Commissioner's Office, they can contact the Information Commissioner's Office via <https://ico.org.uk>

Further information

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

- [In the picture: A Data Protection Code of Practice for surveillance cameras and personal information](#) (ICO, 2017)
- <https://ico.org.uk>
- [Regulation of Investigatory Powers Act \(RIPA\) 2000](#)
- [UK General Data Protection Regulation](#)
- [Data Protection Act 2018](#)
- [Surveillance Camera Code of Practice \(2021\)](#)

Associated policies

Below are listed the associated policies and documents for consideration when reading and reviewing this policy:

- Data Protection Policy
- GDPR Privacy Notices
- Child Protection Policy
- Information Security Policy



APPENDIX ONE: CCTV Log

To be used to log who has accessed CCTV footage and for what purpose.

[illegible]