



"Inspiring a love of lifelong learning"

CCTV POLICY

Learning at Charville is underpinned by our Core Values

Respect

Independence

Self-belief

Honesty

Caring

Determination

Reviewed by: Matthew Wilkinson

Date: March 2024

Last reviewed on: March 2024

Next review due by: March 2025

CONTENTS

Section	Item	Page Number
1	Purpose	3
2	Scope	3
3	Location of cameras	4
4	Covert Monitoring	4
5	Storage and Retention of CCTV images	4
6	Access to CCTV Images	5
7	Subject Access Requests	5
8	Access and Disclosure of Images to Third Parties	5
9	Responsibilities	5
10	Privacy Impact Assessments and Privacy by Design	6
11	Policy Review	6
	Appendix	7

1. Purpose

The purpose of this policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at Charville Academy.

CCTV systems are installed externally on the premises for the purpose of enhancing the security of the building.

CCTV systems are installed internally covering access areas to, and the common parts of, The Hub (our specialist resource provision)

Signage will make occupants and visitors aware of the system. CCTV surveillance at the academy is intended for the purposes of:

- Protecting the academy buildings and assets, both during and outside school hours;
- Promoting the health and safety of staff, pupils and visitors as well as for monitoring student behaviour;
- Preventing bullying;
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- Supporting the police in a bid to deter and detect crime within the range of the cameras;
- Assisting in identifying, apprehending and prosecuting offenders;

The system does not have sound recording capability.

The CCTV system is owned and operated by the academy, the deployment of which is determined by the academy's leadership team and this policy.

The academy's CCTV is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2016/679.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are made aware of their responsibilities in following the CCTV Code of Practice. All employees are aware of the restrictions in relation to, access to, and disclosure of recorded images.

2. Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. The academy complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use.

CCTV signage is clearly and prominently placed around the site. Signs contain details of the purpose for using CCTV (see Appendix A).

The planning and design have endeavoured to ensure that the system will give maximum effectiveness and efficiency, but it is not guaranteed that the system will cover or detect every single incident taking place in the areas of coverage.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the academy, including the Equality and Diversity Policy, codes of practice for dealing with complaints of Bullying and Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other educational related legislation.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g., race, gender, sexual orientation, national origin, disability etc.

CCTV monitoring of public areas for security purposes within academy premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the academy or a student attending the academy.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the academy. Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulations and Data Protection Act 2018.

3. Location of Cameras

The cameras are sited so that they only capture images relevant to the purposes for which they have been installed (as described above), and care will be taken to ensure that reasonable privacy expectations are not violated. The academy will ensure that the location of equipment is carefully considered to ensure that the images captured comply with the legislation.

The academy will make every effort to position the cameras so that their coverage is restricted to the academy premises and site.

Members of staff will have access to details of where CCTV cameras are situated.

CCTV Video Monitoring and Recording of Public Areas may include the following:

- Protection of academy buildings and property: The building's perimeter, entrances and exits, storage areas and receiving areas for goods/services.
- Monitoring of Access Control Systems: Monitoring and recording restricted access areas at entrances to buildings and other areas.
- Verification of security alarms: Intrusion alarms, exit door controls, external alarms
- Video Patrol of public areas: Parking areas and Main entrance/exit gates
- Criminal Investigations (carried out by the police): Robbery, burglary and theft surveillance.

4. Covert Monitoring

The academy will not engage in covert surveillance

5. Storage and Retention of CCTV Images

Recorded data will not be retained for longer than 31 days except where the images identify an issue and is retained specifically in the context of an investigation/prosecution of that issue. The academy will store data securely at all times on the system.

6. Access to CCTV Images

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

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

- Headteacher
- Deputy and Assistant Headteacher(s)
- Data Protection Officer
- Site Manager and Assistant Site Manager

Police can request to view footage. Supervising the access and maintenance of the CCTV System is the responsibility of the Site Manager and Headteacher. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

7. Subject Access Requests (SAR)

- 7.1 Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the GDPR.
- 7.2 All requests should be made in writing to the Data Protection Officer who can be contacted by email to dpo@charvilleacademy.org Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location
- 7.3 The academy will not provide copies of CCTV footage but instead the applicant may view the CCTV footage if available.
- 7.4 The academy will respond to requests within 30 days of receiving the request but if a request is received outside of a school term this may not be possible.
- 7.5 The academy reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

8. Access and Disclosure of Images to third parties

- 8.1 There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police and service providers to the academy where these would reasonably need access to the data (e.g. investigations)
- 8.2 Requests for images should be made in writing to the Data Protection Officer

- 8.3 The data may be used within the academy's disciplinary and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.
- 8.4 If an order is granted by a court for disclosure of CCTV images, then this should be complied with. However careful consideration must be given to exactly what the court order requires. The Data Protection Officer should be consulted and legal advice may be required.

9. Responsibilities

The Headteacher will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy
- Oversee and coordinate the use of CCTV monitoring for safety and security purposes within the academy.
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access (e.g. an access log) to, or the release of, recordings or any material recorded or stored in the system
- Ensure that monitoring recorded on hard drives is not duplicated for release
- Ensure that the view of the perimeter of the academy site from fixed location cameras conforms to this policy
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the academy and be mindful that no such infringement is likely to take place
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of 'Reasonable Expectation of Privacy'
- Ensure that the hard drive is stored in a secure place with access by authorised personnel only
- Ensure that images recorded on the hard drive are stored for a period not longer than 31 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Headteacher.
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee there is no unwarranted invasion of privacy
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual's reasonable expectations of privacy in public areas.

10. Privacy Impact Assessments and Privacy by design

CCTV has the potential to be privacy intrusive. The academy will perform a privacy impact assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and address a pressing need identified.

11. Policy Review

The Data Protection Officer is responsible for monitoring and reviewing this policy. This policy will be reviewed annually. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

Written by:	Matthew Wilkinson, School Business Manager & DPO
Approved:	Resources, Audit, Risk & Finance committee
Date approved:	March 2024
Review date:	March 2025

Appendix A

CCTV Signage

It is a requirement of the Data Protection Act to notify people entering CCTV protected areas that the area is monitored by CCTV and that pictures are recorded. The academy is to ensure that this requirement is fulfilled. The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purposes for which CCTV is used
- The name of the Academy
- The contact telephone number or address for enquiries.

Example Sign

