



CCTV POLICY

Document Details	
Policy owner	CFOO
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Review	2 years - The board delegates the approval of the CCTV policy template to the Chief Finance and Operations Officer. The Chief Finance and Operations Officer is responsible for ensuring the policy complies with all legal requirements and aligns with the trust's objectives. Any changes to the policy must be reported to the board at the next meeting.

Version History

V24.1	February 2024	Introduction - Added in a note for schools to remember to check that the reasons listed within the policy for having the CCTV system has been personalised. Updated the URL to link to the latest ICO Video Surveillance guidance.
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CCTV Policy

Introduction

This is the Hope Learning Community approved policy relating to the use of CCTV. Lexden Springs School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent loss or damage to the school property.

The system comprises 24 cameras.

The system does not have sound recording capability.

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

The CCTV is monitored centrally from the main office, site office and the residential office by the support staff, senior leadership team, the site team and the residential team.

The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and the school community.

The school's CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act (DPA). The use of CCTV, and the associated images and any sounds recordings is covered by the DPA. This policy outlines the school's use of CCTV and how it complies with the legislation.

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

Statement of Intent

The school complies with the Information Commissioner's Office (ICO) Video Surveillance Guidance (including CCTV) to ensure it is used responsibly and safeguards both trust and confidence in its use. The Video Surveillance Guidance is published at:

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/>

CCTV warning signs will be clearly and prominently placed at all external entrances. Signs will contain details of the purpose for using CCTV (see Appendix A). In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

The planning and design has endeavoured to ensure that the system will give 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.

Positioning the Cameras

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

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

CCTV will not be used in classrooms but in areas within school that have been identified by staff and pupils as not being easily monitored.

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

Covert Monitoring

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

- Where there is good cause to suspect that an illegal or unauthorised action(s), is 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 a member of the senior leadership team.

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 toilet cubicles.

Storage and Retention of CCTV Images

The school retains CCTV images for 30 days.

The school stores CCTV images by recording them to a hard disk which is overwritten. The cameras in residential do not retain images and are a live feed only.

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.

Subject Access Requests (SAR)

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

All requests should be made in writing using the SAR request form to the Compliance Officer. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example, data, time and location.

The school will respond to requests within 1 calendar month of receiving the request.

The school 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.

Please see the Subject Access Request policy for further details.

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 by third parties should be assessed using the school's Third Party Request for Information policy.

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.

Complaints

Complaints will be dealt with in accordance with the Trust's Complaints Procedure.

Appendix A: CCTV Signage

It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school 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 purpose of using CCTV.
- The name of the school.
- The contact telephone number or address for enquiries.

