



## **CCTV Policy**

<b>Start Date:</b>	<b>Summer 2024</b>
<b>Date of Next Review:</b>	<b>Summer 2027</b>
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<b>Responsible Committee:</b>	<b>Finance &amp; Resources Committee</b>

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### 1. Policy Statement

Haileybury Turnford uses Close Circuit Television (CCTV) within the school premises. This policy sets out the position of the school concerning the management, operation and use of CCTV at the school.

This policy applies to all members of staff at the school, visitors, contractors and all other persons whose images may be captured by the CCTV system.

This policy takes account of all applicable legislation and guidance, including, but not limited to:

- General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- The Information Commissioner produces a CCTV Code of Practice on their website [Information Commissioner's Office \(ICO\)](#)

## **2. Objectives and targets**

Haileybury Turnford uses CCTV to provide a safer, more secure environment for pupils and staff and to prevent bullying, vandalism and theft. CCTV is used for the following purposes:

- The prevention, investigation and detection of crime.
- The apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings).
- Safeguarding public, pupil and staff safety.
- Monitoring the security of the site.

The school does not use the CCTV system for covert monitoring.

## **3. Location of cameras**

- Cameras are located in those areas where the school has identified a need and where other solutions are ineffective. The school's CCTV system is used solely for purposes(s) identified above and is not used to routinely monitor staff conduct.
- Cameras will be used in areas where the subject has a heightened expectation of privacy e.g. changing rooms or toilets. In these areas, the school will use increased signage in order that those under surveillance are fully aware of its use.

## **4. Identification**

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 signs will:

- Be clearly visible and readable.
- Contain details of the organisation operating the scheme, the purpose for using CCTV and who to contact about the scheme.
- Be an appropriate size depending on context

## **5. Type of equipment**

The school's standard CCTV cameras record visual images only and do not record sound.

## **6. Administration**

The data controller, Haileybury Academy Trust, has responsibility for the control of images and deciding how the CCTV system is used. The school has notified the Information Commissioner's Office of both the name of the data controller and the purpose for which the images are used.

Access to CCTV is limited to those listed in appendix 1. These employees are aware of the procedures that need to be followed when accessing the recorded images. All employees are aware of their responsibilities under the CCTV Code of Practice, which can be found on the Information Commissioner's Office website. [Information Commissioner's Office \(ICO\)](#)

Access to recorded images is restricted to staff that need to have access in order to achieve the purpose of using the equipment. All access to the images is documented. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images. Under the Schools (Specification and Disposal of Articles) Regulations 2013, school staff can view CCTV footage in order to make a decision as to whether to search a pupil for an item. If the recorded footage reveals that theft has been committed by a member of staff, this evidence may be used in a disciplinary case.

Access to CCTV is only to be via a school desktop computer and the password should not be stored on the computer, the user must input it on each access attempt. No-one should attempt to access the feed via a tablet or their mobile phone. This is to ensure that images are not seen or accessed by unauthorised persons.

## **7. CCTV Management and access**

- The CCTV system is managed by the IT Manager
- Viewing of CCTV images is limited to those fulfilling the roles listed in appendix 1
- No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to the disclosure of images.

## **8. Storage and retention of CCTV images**

- Images are held for a maximum of 50 days before being deleted.
- Images may be held for longer than 50 days if it is for a specific purpose.
- The school will ensure that there are security measures in place to prevent the unlawful or inadvertent disclosure of any recorded images.
  - Access to the recorded images is limited and controlled.
  - The CCTV system is password protected.
- The school reserves the right to use images captured on CCTV where there is activity that the school cannot be expected to ignore such as criminal activity, potential gross misconduct, or behaviour which puts others at risk.
- Images retained for evidential purposes will be retained in a secure area accessible by the IT Manager. Where images are retained, the IT Manager will ensure the reason for its retention is recorded, where it is kept, any use made of the images and finally when it is destroyed.

## **9. Disclosure**

Disclosure of the recorded images to third parties can only be authorised by the Principal.

Disclosure will only be granted:

- If its release is fair to the individuals concerned.
- If there is an overriding legal obligation (e.g. information access rights).
- If it is consistent with the purpose for which the system was established.

All requests for access or for disclosure are recorded. If access or disclosure is denied, the reason is documented.

Disclosure may be authorised to law enforcement agencies, even if a system was not established to prevent or detect crime, if withholding it would prejudice the prevention or detection of crime.

## **10. Subject access requests**

- Any requests for images should be submitted on the Subject Access Request form (Appendix 3)
- Any individual record in any CCTV image is a data subject for the purposes of Data protection legislation and has the right to request those images.
- Anyone who requests access to images of themselves will be considered to make a Subject Access request under Data Protection Legislation.
- When a SAR is made the IT Manager will review the CCTV footage 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 limited to footage which only contains the individual making the SAR.
  
- If the footage contains images of other individuals the school will consider
  - Whether the images can be distorted so as not to identify the other individuals
    - If the individuals in the footage have consented to the disclosure of the images, or their consent could be obtained
    - If consent is not obtained the school will consider whether it is reasonable to disclose the images to the individual making the SAR.
- A secure record must be kept of all disclosures which sets out
  - When the request was made
  - The process followed by the IT Manager
  - The considerations as to whether to allow access to the images
  - Whether a copy of the images was provided, if so to whom, when and in what format.

## **11. Monitoring and evaluation**

The school undertakes regular audits to ensure that the use of CCTV continues to be justified. The audit includes a review of: Its stated purpose.

- The location.
- The images recorded.
- Storage length.
- Deletion

## **12. Disclosure of images to third parties.**

- Images will only be disclosed for third parties where the school is permitted to do so in accordance with Data Protection Legislation.
- CCTV images will only be disclosed to law enforcement agencies in line with the purposes of the CCTV system as stated in 2. *Objectives & Targets* of this policy.

## **13. Review**

- This policy will be reviewed every three years by the governing body.
- If the school decides to change the way in which it uses CCTV, it will inform the Information Commissioner within 28 days.

## **14. Misuse of CCTV**

- The misuse of the CCTV system could constitute a criminal offence.
- Any member of staff who breaches this policy may be subject to disciplinary action

## **Appendix 1**

Staff permitted access to recorded CCTV footage

Data request to be submitted to

- PA to the Principal

Senior Leadership Team

- Principal
- Vice Principals x2
- Assistant Principals x5
- Business Manager

Pastoral staff

- Year Achievement Co-ordinators, Year 7 – Year 13
- Assistant Year Achievement Co-ordinators, KS3 – KS5

Management of the CCTV system

- IT Manager
- IT Technician

Members of the Governing Body may view CCTV footage if it plays a role in an incident that is reviewed by a governor panel.

## **Appendix 2**

Access to and use of CCTV in school

Those listed in appendix A will be able to access the CCTV images to investigate incidents as they occur within the school.

- They will be able to review the CCTV
- Take a copy if appropriate for the investigation
- Details of the access and copy will be logged
- At the conclusion of the investigation the CCTV footage will be destroyed and its destruction noted in the log.

CCTV will not be shared with

- Students
- Parents/carers
- Members of the public
- Staff who are not listed in appendix A as having access to the CCTV

If requested we will hand copies of incidents to the Police to support their investigations. Details of the data handed over will be logged.

## Subject Access Request Form

### Section 1 – Subject Details

Request made by:	
Date of Request:	
Date & time of incident:	

Incident details:	
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**Section 2 – Applicant Details**

The subject or the parent/carer or legal guardian of the subject.

Title (please tick one):	Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Title (please state):
Forename(s):	
Family Name:	
Current Address:	
Postcode	
Daytime Telephone No:	
Email Address:	

If not known to the school the applicant will be asked to prove their identity by providing a piece of photo identity

Proof of identity required	Yes / No	Proof of identity seen	Yes / No
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