



CCTV Policy



1	Summary	CCTV Policy			
2	Responsible person	Britta Dickinson-Fry			
3	Accountable SLT member	Caroline Knight			
4	Applies to	<input checked="" type="checkbox"/> All staff <input type="checkbox"/> Support staff <input type="checkbox"/> Teaching staff			
5	Who has overseen development of this policy	Caroline Knight and Governors			
6	Who has been consulted and recommended policy for approval	Staff			
7	Approved by and date	31/01/2023			
8	Version number	3			
9	Available on	Every	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Trust website Academy website SharePoint	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> Y <input type="checkbox"/> N
10	Related documents (if applicable)				
11	Disseminated to	<input type="checkbox"/> Trustees/governors <input checked="" type="checkbox"/> All staff <input type="checkbox"/> Support staff <input type="checkbox"/> Teaching staff			
12	Date of implementation (when shared)	31/01/2023			
13	Consulted with recognised trade unions	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N			

CCTV policy

Introduction and Aims

This policy aims to set out the school's approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on school property.

Thorpepark Academy uses closed circuit television (CCTV) images to reduce crime and monitor the academy buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to academy property. The system is in operation 24 hours a day, 365 days per year.

The system comprises of a number of fixed and dome cameras.

The system does record images 24 hours per day which are kept for 28 days after this time the images are recorded over. The CCTV equipment does not have sound recording capability.

The CCTV system is owned and operated by the academy and the deployment of which is determined by the academy's Management team.

The CCTV is monitored centrally from the Site Facility Office by the Site Facility Officers and the Senior Business Manager room by the Business Manager Office. Office staff have a screen in the main office where which 4 main entrance cameras are monitored.

The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and the Academy and/or Trust.

The academy's CCTV System is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 2018. This policy outlines the academy's use of CCTV and how it complies with the Act.

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 know what is expected 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.

Statement of Intent

The purpose of the CCTV system is to: -

- Make members of the school community feel safe
- Protect members of the school community from harm to themselves or to their property
- Deter criminality in the school
- Protect school assets and buildings
- Assist police to deter and detect crime
- Determine the cause of accidents
- Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings
- To 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
- 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.

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.

Footage or any information gleaned through the CCTV system will never be used for commercial purposes.

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.

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.

Relevant legislation and guidance

This policy is based on:

Legislation

- [UK General Data Protection Regulation](#)
- [Data Protection Act 2018](#)
- [Human Rights Act 1998](#)
- [The Freedom of Information Act 2000](#)
- [The Education \(Pupil Information\) \(England\) Regulations 2005 \(as amended in 2016\)](#)
- [The Freedom of Information and Data Protection \(Appropriate Limit and Fees\) Regulations 2004](#)
- [The School Standards and Framework Act 1998](#)
- [The Children Act 1989](#)
- [The Children Act 2004](#)
- [The Equality Act 2010](#)

Guidance

- [Surveillance Camera Code of Practice \(2021\)](#)

Definitions

Surveillance: the act of watching a person or a place

CCTV: closed circuit television; video cameras used for surveillance



Covert surveillance: operation of cameras in a place where people have not been made aware they are under surveillance

Siting the Cameras

Cameras will be sited so they only capture images relevant to the purposes for which they are installed (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 images captured comply with the Data Protection Act/GDPR regulations.

The academy will make every effort to position cameras so that their coverage is restricted to the academy premises, which may include outdoor areas and cover boundary entrances.

CCTV will not be used in classrooms

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.

Covert Monitoring

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

- i) 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;
- ii) 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 management 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 toilets.

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.

Only relevant management staff member will view the footage.

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)

According to UK GDPR and DPA 2018, individuals have the right to request a copy of any CCTV footage of themselves.



Upon receiving the request the school will immediately issue a receipt and will then respond within 30 days during term time. The school reserves the right to extend that deadline during holidays due to difficulties accessing appropriate staff members.

All staff have received training to recognise SARs. When a SAR is received staff should inform the DPO in writing. When making a request, individuals should provide the school with reasonable information such as the date, time and location the footage was taken to aid school staff in locating the footage.

On occasion the school will reserve the right to refuse a SAR, if, for example, the release of the footage to the subject would prejudice an ongoing investigation.

Images that may identify other individuals need to be obscured to prevent unwarranted identification. The school will attempt to conceal their identities by blurring out their faces, or redacting parts of the footage. If this is not possible the school will seek their consent before releasing the footage. If consent is not forthcoming the still images may be released instead.

The school reserves the right to charge a reasonable fee to cover the administrative costs of complying with an SAR that is repetitive, unfounded or excessive.

Footage that is disclosed in a SAR will be disclosed securely to ensure only the intended recipient has access to it.

Footage may be given to the police to help with crime/criminal investigations.

Records will be kept that show the date of the disclosure, details of who was provided with the information (the name of the person and the organisation they represent), and why they required it.

Individuals wishing to make an SAR can find more information about their rights, the process of making a request, and what to do if they are dissatisfied with the response to the request on the [ICO website](#).

Access to and Disclosure of Images to Third Parties

CCTV footage will only be shared with a third party to further the aims of the CCTV system set out in section 1.1 (e.g. assisting the police in investigating a crime).

Footage will only ever be shared with authorised personnel such as law enforcement agencies or other service providers who reasonably need access to the footage (e.g. investigators).

All requests for access should be set out in writing and sent to the headteacher and the DPO.

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 by the GDPR Officer within the school or the Trust DPO in their absence.

Security

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

The system will be checked for faults once a term



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

Complaints

Complaints should be directed to the headteacher or the DPO and should be made according to the school's complaints policy.

Monitoring

The policy will be reviewed annually by the DPO to consider whether the continued use of a surveillance camera remains necessary, proportionate and effective in meeting its stated purposes.

Links to other policies

- GDPR/Data protection policy
- Privacy notices for parents, pupils, staff, governors and suppliers
- Child Protection policy

Further Information

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

- CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)
- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2008/2018
- GDPR (General Data Protection Regulations)

**Appendix A – Checklist**

This CCTV system and the images produced by it are controlled by the Site Staff who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 2018).

Thorpepark Academy has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of customers. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Yearly - Every August	SBM/Trust	August 2023
There is a named individual who is responsible for the operation of the system.	n/a	Frank Scottow / Britta Dickinson-Fry	n/a
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	Serviced by Delta	Delta Security	n/a
Staff and members of the academy community will be consulted about the proposal to install CCTV equipment.	Serviced by Delta	Delta Security	n/a
Cameras have been sited so that they provide clear images.	Serviced by Delta	Delta Security	n/a
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Serviced by Delta	Delta Security	n/a
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	Serviced by Delta	Delta Security	n/a
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Serviced by Delta	Delta Security	n/a
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.	Serviced by Delta	Delta Security	n/a
Except for law enforcement bodies, images will not be provided to third parties.	Serviced by Delta	Head of School/SBM/SMT	
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the	Serviced by Delta	Head of School/SBM/SMT	



Information Commissioner as soon as such a request is made.			
Regular checks are carried out to ensure that the system is working properly and produces high quality images.		Delta Security	

Appendix B – CCTV Signage

It is a requirement of the Data Protection Act 2018 to notify people entering a CCTV protected area 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 purpose of using CCTV
- The name of the academy
- The contact telephone number or address for enquiries

