**CCTV Policy**

1. **Introduction**

1.1 A Closed Circuit Television (CCTV) System is in place in the academy. This system, known as the ‘CCTV System’, comprises a number of cameras installed at strategic locations. All of the cameras are fully operational and are recording.

1.2 For the purpose of this policy, the 'Owner' of the system is the Trust.

1.3 For the purposes of the Data Protection Act 2018 (‘DPA’), the 'Data Controller' is the Trust.

1.4 This policy will be subject to review periodically, but at least biennially, to include consultation with interested parties.

1.5 Throughout this policy it is intended, as far as possible, to balance the objectives of the CCTV System with the need to safeguard the individual's rights. Every effort has been made throughout this policy to indicate that a formal structure has been put in place for the use and processing of the CCTV system and its recordings.

1. **Purpose and Scope of this policy and the use of CCTV in the academy**

2.1 The purpose of this policy is to set out how the CCTV system will be used in the academy, who is responsible for monitoring the system and how the Trust will comply with its obligations under the DPA and General Data Protection Regulations (GDPR) 2018.

* + 1. CCTV is used in the academy to protect the buildings and its assets, to protect the health and safety of pupils, staff and visitors and to help detect, prevent and reduce incidence of criminal activity.
    2. The lawful basis for using CCTV footage in the academy is to allow the academy to perform the public task of offering education and safeguarding the children whilst keeping the school premises safe.

1. **Relationship with other policies**

3.1 This policy should be read in conjunction with the following policies:

3.1.1 Data Protection Policy.

3.1 2 Records Management and Retention Policy.

1. **Roles and Responsibilities**

4.1 The Principal and Business Manager are the overall managers of the CCTV System and responsible for ensuring the objectives and principles set out in this policy are upheld.

4.2 xxxxxxxxxxx have day-to-day responsibility for the monitoring, operation and evaluation of the CCTV System and the implementation of this policy. xxxxxxxx are responsible for maintaining full information as to the incidents dealt with in the management of the CCTV System.

4.3 Set out if any external organisation has any role in supporting or monitoring your CCTV.

1. **Principles**

5.1 The CCTV System is registered with the Information Commissioners Officer and the relevant signs are displayed around school to notify people of the use of CCTV.

5.2 The CCTV System is operated in accordance with the DPA and the Information Commissioner’s Code of Practice at all times.

5.3 The CCTV System is operated in accordance with all the requirements and the principles of the Human Right Act 1998.

5.4 The CCTV System is operated fairly, within the law, and only for the purposes for which it was established and those identified within this policy.

5.5 The public interest in the operation of the system is recognised by ensuring the security and integrity of operational procedures.

1. **Cameras and Area Coverage**

6.1 The areas covered by CCTV, to which this policy refers, are the buildings and grounds of the academy.

6.2 None of the cameras forming part of the system are installed in a covert manner. Some cameras may be enclosed within 'All weather domes' for aesthetic or operational reasons.

1. **Monitoring Equipment**

7.1 A monitor is installed in a secure location. The equipment has the capability of monitoring all cameras simultaneously throughout every 24-hour period.

7.2 The CCTV System records the images from all cameras in real time.

7.3 Access to the cameras, operating controls, recording and reviewing equipment is strictly limited to authorised personnel only.

7.4 Any authorised person operating the cameras always acts with utmost integrity.

7.5 Any replay of pre-recorded data is only undertaken in restricted areas.

7.6 Unauthorised persons do not have access to any part of the CCTV System without the authorisation of the Headteacher.

7.7 All CCTV operators receive training relevant to their role. Further training is provided as necessary.

1. **Privacy and Data Protection**

8.1 All personal data obtained by virtue of the system, is processed fairly and lawfully and, in particular, will only be processed in the exercise of achieving the stated objectives of the CCTV System. In processing personal data, there is total respect for everyone's right to privacy.

8.2 The storage and security of the data will be strictly in accordance with the requirements of the DPA, the Information Commissioner’s Code of Practice and the School’s Data Protection Policy.

8.3 All data is processed in accordance with the principles of the DPA, which are set out in the Data Protection Policy.

8.4 Security measures are in place to prevent unauthorised or accidental access to, alteration, disclosure, or loss and destruction of information.

1. **Maintenance of the CCTV System**

9.1 Provision is made for regular/periodical service checks of the CCTV equipment, which includes cleaning of any all-weather domes or housings, checks on the functioning of the equipment, and any minor adjustments that need to be made to the equipment settings to maintain picture quality.

9.2 xxxxxxxxxxxxxxxxxxxxxxx have full responsibility for all technical hardware aspects of the CCTV system. Should a fault develop all cameras, servers, switches and computers have maintenance and warranty agreements in place.

9.3 xxxxxxxxx will maintain appropriate records in respect of the functioning and maintenance of the cameras.

1. **Handling of recorded material**

10.1 For the purposes of this policy 'recorded material' means any material recorded by, or as the result of, technical equipment which forms part of the CCTV system, but specifically includes images recorded digitally, on hard drive and by way of DVD copying, including digital video prints.

10.2 Subject to the equipment functioning correctly, images from the cameras are recorded throughout every 24-hour period.

10.3 Recorded footage is retained for a period of 30 Days.

10.4 Every digital recording obtained by using the CCTV System has the potential of containing recorded material, which may have to be admitted in evidence at some point during its life span. Irrespective of the format (e.g. DVD, paper copy, etc.), images obtained from the CCTV system are treated strictly in accordance with this policy from the moment they are received until their final destruction.

10.5 Access to, and the use of, recorded material is strictly for the purposes defined in this policy.

10.6 Recorded material is not copied, sold, or used for commercial purposes or the provision of entertainment.

10.7 In complying with the DPA and GDPR 2018, it is intended, as far as reasonably practicable, to safeguard individual rights to privacy and ensure that the recorded material shall be processed lawfully and access restricted at all times.

10.8 The recorded material should not be viewed by anyone other than authorised personnel unless this is permitted by the Principal in consultation with the Data Protection Officer.

10.9 It may be beneficial to make use of 'real' digital recordings for the training and education of those involved in the operation and management of CCTV systems, and for those involved in the investigation, prevention, and detection of crime. Any material recorded by virtue of the CCTV system is only used for such training and education purposes.

10.10 A digital image is a copy of an image or images, which already exists on a hard drive or DVD. Digital images are not taken as a matter of routine. The Headteacher and Deputy Headteacher, must authorise any requests to make digital images from the CCTV System. There must be a good reason for the request. If a digital image is made, the purpose of the request is recorded. The record will include brief details of the nature of the incident together with the location, time and date.

10.11 If a digital image is required in connection with a criminal investigation, it is treated as an exhibit and dealt with in accordance with the rules of evidence in respect of continuity, disclosure and any further requirements as set out by the police or prosecuting authority.

1. **Copyright**

11.1 Copyright and ownership of all material recorded by virtue of the CCTV System remains with the Data Controller.

1. **Requests for access to records**

12.1 The DPA 2018 provides that Data Subjects (individuals to whom ‘personal data’ relate) have a right to request data held about themselves, including those obtained by CCTV.

12.2 The Trust will not provide a copy of CCTV footage to anyone other than the police who make a request to assist with an ongoing investigation and insurers or their legal representatives who make a request as part of an investigation into an ongoing claim.

12.3 If an individual makes a right of access request including CCTV footage, they would not be entitled to receive a copy of the footage but may be invited to view the footage on site.

12.4 If the Trust receives a request from an individual to view CCTV footage, then they will liaise with their Data Protection Officer who will balance the rights of the individual requesting to view the footage against the rights of any other individuals who may be seen in the footage. A decision will be made on a case-by-case basis and communicated to the requester as soon as possible.

1. **Public Information**

13.1 A copy of this policy is made available on request.

13.2 Warning signs are in place at the academy in areas covered by the CCTV system. The signs indicate the presence of CCTV monitoring.

1. **Complaints**

14.1 Any complaints about the Trust’s CCTV System should be addressed to the Principal.

1. **Breaches of this policy**

15.1 Any breach of this policy is initially investigated by the Principal, for the appropriate action to be taken.

1. **Review**

16.1 This policy should be reviewed biennially.

This policy should next be reviewed: April 2025