CCTV Policy

Policy Group:	**Admin & Data**
Policy Ref:	**ADD/02**
Responsible Reviewing Officer and Job Title:	**James Passmore CEO**
Date Written:	**November 2022**
Date Approved by the Board:	**December 2022**
Date of Next Review:	**November 2024**

1. Introduction

a. Pickwick Academy Trust uses closed circuit television (CCTV) images to reduce crime and monitor Trust buildings to provide a safe and secure environment for pupils, staff, and visitors, and to prevent the loss or damage to Trust property.

b. Each system comprises a number of fixed and dome cameras with a mixture of sound and image recording capability.

c. The CCTV systems are owned and operated by the Trust, the deployment of which is determined by the direction of the Trust CEO in conjunction with the Trust Leadership Team/Heads of School and Data Protection Officer. The Trust is the data controller for data captured by the CCTV system.

d. Some of the CCTV equipment is monitored by third party specialists and some is managed and monitored by the schools themselves. The introduction of, or changes to, CCTV monitoring across any Trust site is agreed in advance by the CEO of the Trust and is subject to a Data Protection Impact Assessment (DPIA) with the Data Protection Officer.

e. The Trust's CCTV Scheme is registered with the Information Commissioner's Office (ICO) under the terms of the Data Protection Act 2018. The use of CCTV, (associated images and any sound recordings) is covered by the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). This policy outlines the Trust's use of CCTV and how it complies with the Act.

f. 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.

2. Purpose and Scope

a. The policy outlines the obligations of Pickwick Academy Trust to ensure that all staff are aware of, and adhere to, the appropriate use of CCTV systems and images.

3. Responsibilities and Accountabilities

a. The Trust CEO is responsible for broadcasting the policy and its requirements and the Trust Leadership Team/Heads of School are responsible for ensuring that the policy is adhered to. This will include familiarisation of all staff including those with specific roles associated with CCTV within their responsibilities. It will also include the establishment of arrangements for conducting annual reviews and obtaining their findings/remedial actions.

b. The Data Protection Officer for Pickwick Academy Trust is One West who can be contacted at: i-west@bathnes.gov.uk

4. Compliance with ICO Requirements

a. The Trust complies with Information Commissioner's Office CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. You can find the latest CCTV Code of Practice at: https://ico.org.uk/. CCTV warning signs are clearly

and prominently placed at all external entrances to the Trust buildings that contain CCTV installations, including trust gates if coverage includes outdoor areas. In school areas where CCTV is used, the Trust will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled areas.

Siting the Cameras

a. The planning and design process 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.

b. Cameras will be sited so they only capture images relevant to the purposes for which they are installed, and care will be taken to ensure that reasonable privacy expectations are not violated. The Trust will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

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

d. CCTV will not be used in classrooms but in areas within schools that have been identified by staff as not being easily monitored (they can be installed in classrooms but only if there is a very good reason for doing so).

e. Members of staff should have access to details of where CCTV cameras are situated, except for cameras placed for covert monitoring.

5. Covert Monitoring

a. The Trust 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.

b. In these circumstances, authorisation must be obtained in advance from the Trust CEO and Data Protection Officer.

c. Covert monitoring must cease following completion of an investigation.

d. Cameras sited for covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles or changing rooms.

6. Storage and Retention of CCTV Images

a. Recorded data will not be retained for longer than is necessary and is disposed of appropriately within 30 days of the recording. 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.

b. All retained data will be stored securely.

c. Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available unless as part of an investigation and only then as part of the subject access request process.

7. Subject Access Requests (SAR)

a. Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act 2018 and General Data Protection Regulation (GDPR) using a Subject Access Request Form

b. All Subject Access Requests should be directed to the Trust Data Protection Officer in the first instance. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

c. The Trust will respond to requests within one calendar month of receiving the written request.

d. The Trust 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 to and Disclosure of Images to Third Parties

a. 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 Trust where these would reasonably need access to the data (e.g. investigators).

b. Requests should be made in writing to the Trust Data Protection Officer and CEO.

c. The data may be viewed and used as part of an investigation where it is necessary to use it within the Trust's discipline and grievance procedures and will be subject to the usual confidentiality requirements of those procedures.

9. Complaints

a. Complaints and enquiries about the operation of CCTV within the Trust should be directed to the Executive Headteacher in the first instance.

10. Equal Opportunities

An Equality and Diversity Impact Assessment has been completed in order to ensure it complies with equality obligations outlined in discrimination legislation. The policy positively reflects the aims and ambitions of Pickwick Academy Trust.

11. References, acknowledgements and associated documents

a. This policy will be implemented in conjunction with other Pickwick Academy Trust polices in the same group of policies.

b. The Pickwick Academy Trust Privacy Notice can be found on the Trust website: www.pickwickacademytrust.co.uk

c. Further Information on CCTV and its use is available from the following:

- CCTV Code of Practice (published by the Information Commissioners Office)
- www.ico.org.uk
- Data Protection Act 2018

12. Appendices

a. Appendix 1: Checklist to support review every two years
b. Appendix 2: CCTV Signage

Appendix 1- Checklist to support review every two years

This CCTV system and the images produced by it are controlled by the Trust CEO with support from the Headteacher who is responsible for how the system is used and for notifying the Information Commissioner's Office about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

Pickwick Academy Trust has considered the need for using CCTV and has decided it is required for the prevention and detection of crime and for protecting the safety of pupils, staff and visitors. It will not be used for other purposes. An annual review of our use of CCTV is performed at each site and this is conducted under the direction of the Data Protection Officer.

	Date Checked	By	Date of next review
Notification has been submitted to the Information Commissioner's Office and the next renewal date recorded.	Nov 2020	DPO	Nov 2024
There is a named individual who is responsible for the operation of the system.	Oct 2020	DPO	Nov 2024
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.	Oct 2020	DPO	Nov 2024
Staff and members of the school governors will be informed about the proposal to install CCTV equipment.	As required	DPO	Nov 2024
A Data Protection Impact Assessment will be completed prior to any change of installation or new installation by the Data Protection Officer	As required	DPO	Nov 2024
Cameras have been sited so that they provide clear images.	Annually	DPO	Nov 2024
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Annually	DPO	Nov 2024
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).	Annually	DPO	Nov 2024
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Annually	DPO	Nov 2024
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. CCTV footage is only retained for a maximum of 30 days. This means the right of erasure will not apply as erasure will happen automatically after 30 days.	Annually	DPO	Nov 2024

Except for law enforcement bodies, images will not be provided to third parties.	Annually	DPO	Nov 2024
The organisation knows how to respond to individuals making requests for copies of their own images. The Data Protection Officer will lead this process.	As required	DPO	Nov 2024
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Annually	DPO	Nov 2024

Upon completion of this review, the findings along with any remedial actions must be sent to the Trust CEO and reported to the Data Protection Officer and will form part of the Trust risk register.

Appendix 2 – CCTV Signage

It is a requirement of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school and the Trust is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- Inside the School building:

- Outside the School Building: