



CCTV System Policy

ADOPTION AND AMENDMENTS TO CCTV SYSTEM POLICY

Section	Trust Meeting or Committee
Whole document	Board of Directors – 9 th March 2019
Whole document	FAHRCT – 5 th May 2022
Whole document	FAHRCT – 8 th May 2025
	Next review: 2027/2028

1. Policy Statement

1.1 The Kingsbridge Educational Trust (the Trust) uses Close Circuit Television (“CCTV”) within the premises of the Trust. The purpose of this policy is to set out the position of the Trust as to the management, operation and use of the CCTV at the Trust.

1.2 This policy applies to all members of our workforce, visitors to Trust premises and all other persons whose images may be captured by the CCTV system. This policy takes account of all applicable legislation and guidance, including:

1.2.1 The General Data Protection Regulation (“GDPR”) —The Data Protection Act 2018 - <https://www.legislation.gov.uk/ukpga/2018/12/contents>

1.2.2 Surveillance Camera Code of Practice - <https://www.gov.uk/government/publications/update-to-surveillance-camera-code/amended-surveillance-camera-code-of-practice-accessible-version>

1.2.3 Human Rights Act 1998 - <https://www.legislation.gov.uk/ukpga/1998/42/contents>

This policy sets out the position of the Trust in relation to its use of CCTV.

2. Purpose of CCTV

2.1 The Trust uses CCTV for the following purposes:

2.1.1 To provide a safe and secure environment for pupils, staff and visitors

2.1.2 To prevent the loss of or damage to the Trust’s buildings and/or assets

2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

2.1.4 To increase personal safety and reduce the fear of crime;

2.1.5 To assist in managing the school.

2.2 The Trust sites uses fixed cameras indoors and in outside areas of its sites. Cameras are not equipped for sound recording.

3. Statement of intent

3.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.

3.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The Trust will make all reasonable efforts to ensure that areas outside of the Trust premises are not recorded.

3.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.

3.4 Cameras will not be sited in areas where individual have a heightened expectation of privacy, such as changing rooms or toilets.

4. Management and Access

4.1 The CCTV systems will be managed as follows:

4.1.1 Internal Cameras linked to Schools’ networks – Head of IT, mannewar.hussain@ket.education.

- 4.1.2 External Cameras – School’s senior Site Staff
- 4.2 On a day to day basis the CCTV system will be operated by staff in academies with delegated authority as appropriate.
- 4.3 The viewing of live CCTV images will be restricted to members of staff in academies and Trust offices with explicit powers to view images, for the reasons set out in Paragraph 2 above.
- 4.4 Recorded images which are stored by the CCTV system will be restricted to access by members of staff in academies and Trust offices with explicit powers to view images, for the reasons set out in Paragraph 2 above.
- 4.5 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 disclosure of images.
- 4.6 The CCTV systems are checked at least weekly by staff members listed at 4.1 above in academies to ensure that it is operating effectively.

5. Storage and Retention of Images

- 5.1 Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.
- 5.2 Recorded images are stored in accordance with the Data Retention Policy unless there is a specific purpose for which they are retained for a longer period. (This period may vary slightly depending on the capacity and overwrite protocol of individual recording equipment).

The Trust will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

- 5.2.1 CCTV recording systems being located in restricted access areas;
- 5.2.2 The CCTV system being encrypted/password protected;
- 5.2.3 Restriction of the ability to make legitimate copies to specified members of staff

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by the personnel listed in 4.1 above.

6. Disclosure of Images to Data Subjects

- 6.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images. Requests for Data Subject Access should be made in writing to the Trust Data Controller, at data.controller@ket.education
- 6.2 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the Trust’s Combined Data Protection and Freedom of Information Policy.
- 6.3 When such a request is made the staff listed at 4.1 above or their appropriately nominated representative will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.
- 6.4 If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the

individual making the request. The staff listed at 4.1 above or their representative must take appropriate measures to ensure that the footage is restricted in this way.

- 6.5 If the footage contains images of other individuals then the Trust must consider whether:
- The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
 - The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
 - If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
- 6.6 A record must be kept, and held securely, of all disclosures which sets out:
- When the request was made;
 - The process followed by the school's senior site staff in determining whether the images contained third parties;
 - The considerations as to whether to allow access to those images;
 - The individuals that were permitted to view the images and when; and
 - Whether a copy of the images was provided, and if so to whom, when and in what format.
- 6.7 In most cases the Trust will not charge a fee to comply with a subject access request. However, where the request is manifestly unfounded or excessive it may charge a "reasonable fee" for the administrative costs of complying with the request. It may also charge a reasonable fee if an individual requests further copies of their data following a request basing the fee on the administrative costs of providing further copies.

7. Disclosure of Images to Third Parties

- 7.1 The Trust will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.
- 7.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.
- 7.3 If a request is received from a law enforcement agency for disclosure of CCTV images the staff listed at 4.1 above must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.
- 7.4 The information above must be recorded in relation to any disclosure.
- 7.5 If an order is granted by a Court for disclosure of CCTV images then this must be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Controller should be contacted in the first instance and appropriate legal advice may be required.

8. Review of Policy and CCTV System

The CCTV system and the privacy impact assessment relating to it will be reviewed every three years or sooner if required.

9. Misuse of CCTV systems

9.1 The misuse of CCTV system could constitute a criminal offence.

9.2 Any member of staff who breaches this policy may be subject to disciplinary action.

10. Complaints relating to this policy

Any complaints relating to this policy or to the CCTV system operated by the Trust should be made in accordance with The Trust Complaints Policy.

Copies of this Policy will be available to staff on schools' shared drives and to the public from school receptions.