Old Clee Primary Academy

'Inspired to Believe, Learning to Succeed'

CCTV Policy

Approved by:	Audit and Risk	**Date:** June 2025
Last reviewed on:	January 2024	
Next review due by:	Summer 2026	

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1. Aims

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

1.1 Statement of intent

The purpose of the CCTV system is to:

- Make members of the academy community feel safe and prevent bullying
- Protect members of the academy community from harm to themselves or to their property
- Deter criminality in the academy
- Protect academy 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 academy as notified the Information Commissioner under the terms of the Data Protection Act 2018 for which the images are used. The system complies with the requirements of the Data Protection Act 2018 and the 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.

2. Relevant legislation and guidance

This policy is based on:

2.1 Legislation

- UK General Data Protection Regulation
- Data Protection Act 2018
- Human Rights Act 1998
- European Convention on Human Rights
- The Regulation of Investigatory Powers Act 2000
- The Protection of Freedoms Act 2012
- 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
- Freedom of Information Act 2000

2.2 Guidance

- Surveillance Camera Code of Practice (2021)
- ICO's CCTV Code of Practice

3. 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

4. Covert surveillance

Covert surveillance will only be used in extreme circumstances, such as where there is suspicion of a criminal offence. If the situation arises where covert surveillance is needed (such as following police advice for the prevention or detection of crime or where there is a risk to public safety), a data protection impact assessment will be completed in order to comply with data protection law.

5. Location of the cameras

Cameras are located in those areas where the academy has identified a need and where other solutions are ineffective. The academy's CCTV system is used solely for purposes(s) identified in section 1.1.

Wherever cameras are installed appropriate signage is in place to warn members of the academy community that they are under surveillance.

Cameras are positioned in order to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

6. Roles and responsibilities

6.1 The governing board

The governing board has the ultimate responsibility for ensuring the CCTV system is operated within the parameters of this policy and that the relevant legislation (defined in section 2.1) is complied with.

6.2 The headteacher

The headteacher will:

- Take responsibility for all day-to-day leadership and management of the CCTV system
- Liaise with the data protection officer (DPO) to ensure that the use of the CCTV system is in accordance with the stated aims and that its use is needed and justified
- Ensure that the guidance set out in this policy is followed by all staff
- Review the CCTV policy to check that the academy is compliant with legislation
- Ensure all persons with authorisation to access the CCTV system and footage have received proper training
- Sign off on any expansion or upgrading to the CCTV system, after having taken advice from the DPO and having taken into account the result of a data protection impact assessment
- Decide, in consultation with the DPO, whether to comply with disclosure of footage requests from third parties

6.3 The data protection officer (DPO)/School Business Manager

The DPO will:

- Deal with subject access requests in line with the UK GDPR and Data Protection Act 2018
- Monitor compliance with UK data protection law
- Advise on and assist the academy with carrying out data protection impact assessments
- Act as a point of contact for communications from the Information Commissioner's Office (ICO)
- Conduct data protection impact assessments
- Ensure data is handled in accordance with data protection legislation
- Ensure footage is obtained in a legal, fair and transparent manner
- Ensure footage is destroyed when it falls out of the retention period
- Keep accurate records of all data processing activities and make the records public on request
- Inform subjects of how footage of them will be used by the academy, what their rights are, and how the academy will endeavour to protect their personal information
- Ensure that the CCTV systems are working properly and that the footage they produce is of high quality so that individuals pictured in the footage can be identified

- Ensure that the CCTV system is not infringing on any individual's reasonable right to privacy in public spaces
- Carry out checks to determine whether footage is being stored accurately, and being deleted after the retention period
- Receive and consider requests for third-party access to CCTV footage

6.4 Premises Team

The CCTV system is maintained by the academy's premises team, who periodically inspect the cameras to ensure that date and time references are accurate, clear images are recorded and that as far as possible equipment is protected from vandalism.

7. Operation of the CCTV system

The CCTV system will be operational 24 hours a day, 365 days a year.

The system does not record audio.

Recordings will have date and time stamps. This will be checked by the system manager termly and when the clocks change.

8. Storage of CCTV footage

Footage will be retained for 28days. At the end of the retention period, the files will be overwritten automatically.

On occasion footage may be retained for longer than 28days, for example where a law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation.

The DPO will carry out annual audit checks to determine whether footage is being stored accurately, and being deleted after the retention period.

9. Access to CCTV footage

Access will only be given to authorised persons, for the purpose of pursuing the aims stated in section 1.1, or if there is a lawful reason to access the footage.

Any individuals that access the footage must record their name, the date and time, and the reason for access in the access log.

Any visual display monitors will be positioned so only authorised personnel will be able to see the footage.

9.1 Staff access

CCTV access to live images is restricted to:

- Senior Leadership Team
- Site Manager
- Office Manager
- Anyone with express permission of the headteacher

CCTV footage will only be accessed from authorised personnel's work devices, or from the visual display monitors. When viewing recorded footage, staff authorised to view images will do this in a restricted area. In addition, a central log will be kept highlight the date, the reason for viewing the footage and the outcome (see Appendix I).

All members of staff who have access will undergo training to ensure proper handling of the system and footage.

Any member of staff who misuses the surveillance system may be committing a criminal offence, and will face disciplinary action.

9.2 Subject access requests (SAR)

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

Upon receiving SAR the academy will immediately issue a receipt and will then respond within 1 calendar month.

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

On occasion the academy 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 academy will attempt to conceal their identities by blurring out their faces, or redacting parts of the footage. If this is not possible the academy will seek their consent before releasing the footage. If consent is not forthcoming the still images may be released instead.

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

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.

9.3 Third-party access

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 or footage requested from the Health & Safety executive in relation to an accident).

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 academy will comply with any court orders that grant access to the CCTV footage. The academy will provide the courts with the footage they need without giving them unrestricted access. The headteacher/DPO will consider very carefully how much footage to disclose, and the academy will seek legal advice if necessary.

The academy will ensure that any disclosures that are made are done in compliance with the UK GDPR.

All disclosures will be recorded by the academy.

10. Data protection impact assessment (DPIA)

The academy follows the principle of privacy by design. Privacy is taken into account during every stage of the deployment of the CCTV system, including its replacement, development and upgrading.

The system is used only for the purpose of fulfilling its aims (stated in section 1.1).

When the CCTV system is replaced, developed or upgraded a DPIA will be carried out to be sure the aim of the system is still justifiable, necessary and proportionate.

The DPO will provide guidance on how to carry out the DPIA.

Those whose privacy is most likely to be affected, including the academy community and neighbouring residents, will be consulted during the DPIA, and any appropriate safeguards will be put in place.

A new DPIA will be done whenever cameras are moved, and/or new cameras are installed.

If any security risks are identified in the course of the DPIA, the school will address them as soon as possible.

11. Security

- The premises team 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

12. Complaints

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

13. Monitoring

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

The sites manager will also complete an annual review based on the ICO CCTV Checklist

14. Links to other policies

- Data protection policy
- Privacy notices for parents/carers, pupils, staff, governors and suppliers
- Safeguarding policy

Ratification

Date ratified by the Governing Board: June 2025
Date of last review: January 2024
Next review date: Summer 2026

Signed by Chair of Governors: Richard Claridge **Date:** 19th June 2025

Appendix 1

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CCTV Monitoring log

Anyone looking at CCTV needs to have a second person with them and must complete this form.

Date	Time	Name	Name	Reason