



Policy:	CCTV
Owner:	Mick Crossley Facilities and Estates Manager
Approving Board:	Executive Group
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1 Introduction

- 1.1 Thomas Deacon Education Trust ("TDET") uses Close Circuit Television ("CCTV") within the premises of its Academies. The purpose of this policy is to set out TDETs management, operation and use of CCTV.
- 1.2 This policy applies to all members of staff, students, visitors and all other persons whose images may be captured by the CCTV system.
- 1.3 The policy takes account of all applicable legislation and guidance, including:
 - i) General Data Protection Regulation ("GDPR") and the Data Protection Act 2018 (together with Data Protection Legislation)
 - ii) CCTV Code of Practice produced by the Information Commissioner
 - iii) Human Rights Act 1998
- 1.4 This policy sets out the position of the Trust and its Academies in relation to its use of CCTV

2 Purpose of CCTV

- 2.1 TDET uses CCTV for the following purposes:
 - i) To provide a safe and secure environment for pupils, staff and visitors
 - ii) To assist with behaviour management and ensure pupils take responsibility for their behaviour
 - iii) To prevent the loss of or damage to Trust buildings and/or assets
 - iv) To assist in the prevention of crime and disorder
 - v) To assist with traffic management

3 Description of system

- 3.1 Cameras are based in internal and external locations within the Trust sites and may be fixed or movable.

4 Siting of Cameras

- 4.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be cited in prominent positions where they are clearly visible to staff, pupils and visitors.
- 4.2 Cameras will not be sited, so far as possible, to record areas 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.

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

4.4 Signs will be erected so that students, staff and the public are aware that they are in an area where CCTV is in operation

4.5 Contact details regarding the CCTV scheme are displayed on all external gates

5 Privacy Impact Assessment

5.1 Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by the Trust to ensure that the proposed installation is compliant with legislation and ICO guidance.

6 Management and Access

6.1 The CCTV system will be managed by the Thomas Deacon Education Trust Facilities and Estates Manager.

6.2 On a day to day basis the CCTV system will be operated by members of the Academy or Trust site management teams.

6.3 The viewing of live CCTV images will be restricted to Site Management Teams, Academy and Trust Management & leadership teams.

6.4 Recorded images which are stored by the CCTV system will be restricted to access by Site Management Teams, Academy and Trust Management & leadership teams. In the case of an incident being recorded on the CCTV images the Trust may share images with limited individuals who it deems are key in the management of the incident.

6.5 In addition, in some circumstances where it is necessary and proportionate to do so, the images may be shown to pupils involved in an incident either for the purpose of allowing that pupil to understand the impact of their behaviour or as part of the disciplinary process.

6.6 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.

6.7 The CCTV system is checked on a regular basis by the Academy or Trust Site management and IT teams to ensure that it is operating effectively

7 Storage and Retention of Images

7.1 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.

7.2 Recorded images are stored only for a period of 14 days unless there is a specific purpose to retain them for longer. In these circumstances' authorisation must be sought from the Headteacher.

7.3 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:

- 7.3.1 CCTV recording systems located in restricted access areas
- 7.3.2 CCTV system encrypted/password protected
- 7.3.3 Ability to make copies restricted to specific members of staff

7.4 A log of access to CCTV images, including name of individual, time and date of access will be maintained by the Trust.

8 Disclosure of Images to Data Subjects

8.1 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.

8.2 Any individual who requests access to the images of themselves will be considered to have made a subject access request in accordance to the Data Protection Legislation. The request should be considered in the context of the TDET Subject Access Request guidance.

8.3 When a request is made a member of the Academy or Trust management will review the CCTV footage in respect of the relevant time periods in accordance with the request.

8.4 If the footage only contains the individual making the request, the individual may be permitted to view the footage. This must be strictly limited to that footage containing the images of that individual.

8.5 If the footage contains other individuals the Trust must consider whether

- 8.5.1 The request requires the disclosure of the images of individual other than the requester, for example whether the images can be distorted so as not to identify other individuals.
- 8.5.2 The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
- 8.5.3 If not, then whether it is reasonable, in the circumstances, to disclose those images to the individual making the request.

8.6 A record must be kept, and held securely, of all disclosures which sets out:

- 8.6.1 When the request was made

8.6.2 The process followed by the Academy or Trust Management in determining whether the images contained third parties.

8.6.3 The considerations as to whether to allow access to those images.

8.6.4 The individuals that were permitted to view the images and when; and

8.6.5 Whether a copy of the images was provided, and if so to who, when and in what format.

9 Disclosure of images to Third Parties

9.1 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.

9.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

9.3 If a request is received from a law enforcement agency for disclosure of CCTV images, then the member of the Academy or Trust Management 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 and any particular individuals of concern. This will enable proper consideration to be given to what should be disclosed and the potential disclosure of any third-party images.

9.4 The information above must be recorded in relation to any disclosure.

9.5 If an order is granted by a Court for disclosure to CCTV images, then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to a disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

10 Misuse of CCTV systems

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

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

11 Complaints relating to this policy

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

12 Monitoring, evaluation and review

12.1 This policy will be reviewed every 3 years