



CCTV Policy

Approved by MAT Board

26th November 2018



St. Barnabas
MULTI ACADEMY TRUST
Creating Unique Possibilities



1 Introduction

- 1.1 St Barnabas CE Multi Academy Trust uses closed circuit television (CCTV) images to monitor the school's buildings in order to provide a safe and secure environment for pupils, staff and visitors, to reduce crime and to prevent loss or damage to academy property.
- 1.2 The system comprises a number of fixed cameras.
- 1.3 The system sound recording capability is turned off.
- 1.4 The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.
- 1.5 The CCTV is monitored centrally from the school office by school administrator.
- 1.6 The introduction of, or changes to CCTV monitoring will be subject to consultation with staff and the school community.
- 1.7 The academy's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings is covered by the General Data Protection Regulation 2016 (the GDPR) and the Data Protection Act 2018. This policy outlines the school's use of CCTV and how it complies with the data protection legislation.
- 1.8 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. All operators are trained in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.



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2 Statement of Intent

- 2.1 The academy complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:

<https://ico.org.uk/media/1542/cctv-code-of-practice.pdf> Version 1.2 20170609

- 2.2 CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including school gates if coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV. In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.
- 2.3 The planning and design has endeavoured to ensure that the Scheme 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.

3 Siting the Cameras

- 3.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the GDPR and the Data Protection Act 2018.
- 3.2 The school will make every effort to position cameras so that their coverage is restricted to the academy premises, which may include outdoor areas.
- 3.3 CCTV will not be used in classrooms but in areas within the school that have been identified as not being easily monitored.



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- 3.4 Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

4 Covert Monitoring

- 4.1 The school may in exceptional circumstances set up covert monitoring, for example:
- i) 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;
 - ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- 4.2 In these circumstances authorisation must be obtained from a member of the senior leadership team and the Data Protection Officer. A data protection impact assessment will be carried out prior to any covert monitoring and must be signed off by the Data Protection Officer.
- 4.3 Covert monitoring must cease following completion of an investigation.
- 4.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles.

5 Storage and Retention of CCTV images

- 5.1 Recorded data will not be retained for longer than is necessary. 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.
- 5.2 All retained data will be stored securely.



6 Access to CCTV images

- 6.1 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

7 Subject Access Requests (SAR)

- 7.1 Individuals have the right to request access to CCTV footage relating to themselves under the GDPR and the Data Protection Act 2018.
- 7.2 All requests should be made in writing to the Headteacher. 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.
- 7.3 The school will respond to requests within 1 month of receiving the written request.
- 7.4 Under data protection legislation, a fee is not normally charged, although a reasonable fee based on the administrative cost of providing the data can be charged when a request is manifestly unfounded or excessive, particularly if it is repetitive.
- 7.5 The school 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

- 8.1 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 school where these would reasonably need access to the data (e.g. investigators).
- 8.2 Requests should be made in writing to the Headteacher.



8.3 The data may be used within the school's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

9 Complaints

9.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance, who shall consult with the Data Protection Officer.

10 Further Information

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition V1.2 2017 (published by the Information Commissioners Office)
www.ico.gov.uk
- Surveillance Cameras Commissioner
www.gov.uk/surveillance-camera-commissioner
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998
- General Data Protection Regulation 2016 (GDPR)