

CCTV Policy

Policy date: September 2024

Review date: September 2025 (reviewed annually)

Chair of Trustees: Therese Quincey

Control Sheet

Version number	1
Original date approved	September 2024
Current date approved	
Approved by	Finance and General Purposes Committee
Date of next review	
Status	Final
Policy owner	Director of Governance
Policy location	Policies / Corporate Governance Policies
Target group	Staff, Students, Trustees, Governors, Contractors, Public
Trust Board link role	

Document History:			
Version	Date of review	Author	Note of Revisions
Version 1	September 2024	Sarah Hargin	Combined both policies for Kenton School and Studio West as one Trust Policy.

Aim

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

Policy Statement

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

- Northern Leaders Trust (the Trust) uses Closed Circuit Television ("CCTV") within the grounds and premises of its schools. 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 each of its schools.
- This policy applies to all members of our workforce, visitors to the school 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:
 - General Data Protection Regulation ("GDPR")
 - Data Protection Act 2018 (together the Data Protection Legislation)
 - CCTV Code of Practice produced by the Information Commissioner
 - Human Rights Act 1998

Purpose of CCTV

The Trust uses CCTV for the following purposes:

- To provide a safe and secure environment for pupils, staff and visitors
- To prevent the loss of or damage to the school buildings and/or assets
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

Description of system

The systems in each school consist of several digital video recorders (DVRs) including several static and moveable cameras located around the sites, both internally and externally. All cameras are monitored from the relevant Site Manager's Office and access is restricted to the Site Manager and dedicated staff only.

Siting of Cameras

- 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.
- 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 the schools' premises are not recorded.
- Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.
- Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.

Privacy Impact Assessment

- 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.
- The Trust will adopt a privacy by design approach when installing new cameras and systems, considering the purpose of each camera, to avoid recording and storing excessive amounts of personal data.

(See Appendix 1 CCTV Privacy Impact Assessment Statement)

The Trust Board

The Trust board has the ultimate responsibility at Studio West for ensuring the CCTV system is operated within the parameters of this policy and that the relevant legislation (defined in section 1.3) is complied with. Robertsons FM hold the responsibility at Kenton School.

The Principal or designated member of staff

The Principal 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 school is compliant with legislation

Sign off on any expansion or upgrading to the CCTV system, after having taken advice from the DPO and considered 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

The data protection officer

The data protection officer (DPO) will:

- Deal with subject access requests in line with the Freedom of Information Act (2000)
- Monitor compliance with UK data protection law
- Advise on and assist the schools with carrying out data protection impact assessments
- Act as a point of contact for communications from the Information Commissioner's Office
- 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 school, what their rights are, and how the school 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 regular 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

The system manager (Site Manager or Robertsons FM Contractor Manager)

The system manager will:

- Take care of the day-to-day maintenance and operation of the CCTV system
- Oversee the security of the CCTV system and footage
- Check the system for faults and security flaws regularly
- Ensure the data and time stamps are accurate regularly

Management and Access

- The CCTV systems will be managed by the relevant Site Managers or Robertson FM Contract Manager.
- On a day-to-day basis the CCTV system will be operated by the relevant Site Manager or Robertson FM site staff.
- The viewing of live CCTV images will be restricted to the relevant Site Manager, Robertson FM or site staff.
(See Appendix 2 CCTV Viewing Log)
- Recorded images which are stored by the CCTV system will be restricted to access by the relevant Site Manager, Robertson FM site staff or dedicated staff members.
- 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.
- The CCTV system is checked daily by the relevant Site Manager or Robertson FM site staff to ensure that it is operating effectively.

Staff Access

The following members of staff have authorisation to access the CCTV footage:

- The Principal
- The Deputy Principal(s)
- The Data Protection Officer
- The Site Manager / Robertson FM Contract Manager
- Anyone with express permission of the Principal or designated member of staff responsible.

Staff wishing to view CCTV footage should email the Principal or designated member of staff stating

- Why they wish to view the CCTV
- The date and time of the incident they wish to view

Storage and Retention of Images

- 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.
- Recorded images are stored only for a period of up to 30 days unless there is a specific purpose for which they are retained for a longer period.
- 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:
 - CCTV recording systems being in restricted access areas.
 - The CCTV system being encrypted/password protected.
 - Restriction of the ability to make 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 Trust.

Disclosure of Images to Data Subjects

- 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.
- 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 relevant school's Subject Access Request Policy.
- When such a request is made, the relevant Site Manager or Robertson FM site staff will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

- 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 relevant Site Manager or Robertson FM site staff must take appropriate measures to ensure that the footage is restricted in this way.
- 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.
- A record must be kept, and held securely, of all disclosures which sets out:
 - When the request was made.
 - The process followed by the Site Manager or Robertson FM 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.

Disclosure of Images to Third Parties

- 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.
- CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.
- If a request is received from a law enforcement agency for disclosure of CCTV images, then the relevant Site Manager or Robertson FM site staff 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 then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third-party images.
(Appendix 3 CCTV Police Request Form)
- The information above must be recorded in relation to any disclosure.
- If an order is granted by a Court for disclosure of 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 disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

Review of Policy and CCTV System

- This policy will be reviewed annually.
- The CCTV system and the privacy impact assessment relating to it will be reviewed annually.

Misuse of CCTV systems

- The misuse of CCTV system could constitute a criminal offence.
- Any member of staff who breaches this policy may be subject to disciplinary action.

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 school's Complaints Policy.

APPENDIX 1

CCTV PRIVACY IMPACT ASSESSMENT TEMPLATE

1 Who will be captured on CCTV?

Pupils, staff, parents / carers, volunteers, Governors and other visitors, including members of the public.

2 What personal data will be processed?

Facial Images, behaviour.

3 What are the purposes for operating the CCTV system? Set out the problem that the Trust is seeking to address and why the CCTV is the best solution and the matter cannot be addressed by way of less intrusive means.

Health and safety and the prevention or detection of crime.

4 What is the lawful basis for operating the CCTV system?

Legal obligation, legitimate interests of the organisation to maintain health and safety and to prevent and investigate crime.

5 Who is/are the named person(s) responsible for the operation of the system?

Mr Andrew Wilson, Site Manager, Kenton School

Mr Graeme Fairweather, Site Manager, Studio West

Robertson FM Contracts Manager

6 Describe the CCTV system, including:

- a. how this has been chosen to ensure that clear images are produced so that the images can be used for the purpose for which they are obtained
- b. siting of the cameras and why such locations were chosen
- c. how cameras have been sited to avoid capturing images which are not necessary for the purposes of the CCTV system
- d. where signs notifying individuals that CCTV is in operation are located and why those locations were chosen; and
- e. whether the system enables third party data to be redacted, for example via blurring of details of third-party individuals.

- All systems were set up in accordance with the data protection code of practice for surveillance cameras.
- Safeguarding and the prevention or detection of crime etc.

- Please refer to Siting of cameras of the CCTV Policy.
- Signs are located at public entrances and various locations throughout the school premises.
- The system operated by Robertson FM allows for redacted third party data.

7 Set out the details of any sharing with third parties, including processors

Sharing with third parties only takes place upon completion of a schools CCTV Subject Access Request form, with the exception of the Police. All images are stored on hard drive which is on each school site. Access to images is only possible by the relevant Site Manager inputting username and password or by Robertson FM site staff accessing their Control Room.

8 Set out the retention period of any recordings, including why those periods have been chosen

Images are stored for a period of 2-3 weeks before being overwritten by ongoing surveillance.

9 Set out the security measures in place to ensure that recordings are captured and stored securely

Images are captured daily and stored on secure hard drive, which is only accessible by the relevant Site Manager with Username and password or Robertson FM site staff accessing their Control Room.

10 What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?

- Please refer to the Privacy Notices
- Please refer to the CCTV Policy

11 What measures are in place to address the risks identified?

- Data is only stored for a period of 2-3 weeks
- Control Room is locked
- Systems are password protected
- Data transfer is password protected

12 Have parents and pupils where appropriate been consulted as to the use of the CCTV system? If so, what views were expressed and how have these been accounted for?

N/A

13 When will this privacy impact assessment be reviewed?

Annually

APPENDIX 2


CCTV VIEWING LOG

SITE	
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CCTV Operator	
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CCTV

Viewing Log



Date of Viewing	Date of Viewing	Camera Location	Description	Name of who Viewed CCTV	Got/saved Copy of CCTV
				1	
				2	
				3	
				4	

Date & Time of Incident	
Start	
Finish	


Comments	

SITE	
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CCTV Operator	
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CCTV

Viewing Log



Date of Viewing	Date of Viewing	Camera Location	Description	Name of who Viewed CCTV	Got/saved Copy of CCTV
				1	
				2	
				3	
				4	

Date & Time of Incident	

Start	
Finish	

Comments	



SITE	
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CCTV

Viewing Log

CCTV Operator	
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Date of Viewing	Date of Viewing

Camera Location

Description

Name of who Viewed CCTV	
1	
2	
3	
4	

Got/saved Copy of CCTV	
YES	NO

Date & Time of Incident	
Start	
Finish	

Comments	

APPENDIX 3

CCTV Police Request Form

Contact details

Full name of police officer or third party	
Police officer badge number	
Police station	
Address of third party (including full postcode)	
Crime Incident ref no, or Court case ref no	
Telephone no	
Work email	
Give details of the incident under investigation or subject to court proceedings	

Information to enable us to deal with this request

Location of the CCTV camera	
If you're seeking access to a particular image (if known) please indicate below: Date and time the image would have been recorded (please estimate)	
Please provide description of the person or incident you are investigating	
If known, please provide the name of the employee you have been dealing with about this incident or investigation	

Declaration

Please tick the box to declare that the information given in this form is true	
I confirm that I am making this request under one of the following exemptions in DPA 2018 Schedule 2 (please tick which one applies)	

For crime and taxation purposes	
OR	
By order of the court or for legal advice/ proceedings	

Signed:	Date:
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