

Bourne Education Trust CCTV Policy

Introduction

The purpose of this policy is to regulate the management, operation and use of closed circuit television (CCTV) systems used at those Bourne Education Trust schools that make use of this technology.

Each system comprises a number of fixed and dome cameras located around the school site. All cameras are monitored from a central location and the data is only made available to named staff.

This policy follows Data Protection Act 2018 guidelines, the [Information Commissioner's Office \(ICO\) CCTV guidance document](#) and the [Surveillance Camera Code of Conduct](#), as outlined in the Protection of Freedoms Act 2012, and will be subject to review annually to include consultation as appropriate with interested parties.

Each CCTV system is owned by the school.

Objectives of the CCTV scheme:

- To increase personal safety of students, staff, and visitors and reduce the fear of crime
- To protect the school buildings and their assets
- To assist in managing the school
- To protect members of the public and private property
- To support the Police in a bid to deter and detect crime
- To assist in identifying, apprehending and prosecuting offenders.

Statement of intent

Each school using CCTV 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. Each school in the Trust is registered with the ICO, and will treat all information, documents and data collected by the CCTV system as personal data, and as such, subject to the [Data Protection Act 2018](#).

CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including school gates if coverage includes outdoor areas.

Cameras will be used to monitor activities within the school, its carpark(s) and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for securing the safety and well-being of the school users and visitors.

External cameras do not focus on private homes, gardens or other areas of private property. Unless an immediate response to events is required, staff will not direct cameras at an individual, their property or a specific group of individuals.

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).

The planning and design of the CCTV system aims to ensure maximum effectiveness and efficiency, but it is not possible to guarantee that every incident will be covered or detected.

Operation of the system

The operation of the system will be overseen by the Headteacher, in accordance with the principles and objectives outlined in this policy. The day to day operation of the system will be delegated to a named member of staff, and only s/he and named staff identified by the Headteacher will have access to the system and the data collected. All access to the system will be logged. If a live feed from the CCTV system is available, this will be in a restricted area where only approved staff have access.

Siting the cameras

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 Data Protection Act. The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

Storage and retention of CCTV images

Recorded data will be retained for the length of time stated in the Data Retention Policy. 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. All retained data will be stored securely and a log kept of exactly what is being retained, for how long and where stored. If the Police require CCTV data to be retained for possible use as evidence in the future, this data will be transferred to a suitable secure medium and a record of the requested data will be made.

Access to CCTV images

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

Subject access requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act 2018.

All requests should be made in writing to the Headteacher. Individuals submitting requests for access will be asked to provide documentation confirming their identity, plus sufficient information to enable the footage relating to them to be identified, for example, date, time and location.

The school will respond to requests within 28 calendar days of receiving the written request.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation, or where a disproportionate amount of time or expense would be required to process the request.

Access to and disclosure of images to third parties

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police, when requested in writing and where this is needed for an ongoing investigation.

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.

Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.

Checklist

	In place (date)	Date of next review
Notification has been submitted to the ICO and the next renewal date recorded.		
There is a named individual who is responsible for the operation of the system.		
Authorised staff receive suitable training in the system.		
The system chosen produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.		
Staff and members of the school community will be consulted about the proposal to install CCTV equipment.		
Cameras have been sited so they provide clear images, and do not infringe an individual's privacy, e.g. in toilets.		
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.		
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system, contact details are displayed on the sign(s).		
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.		
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated, and in line with the Data Retention Policy.		
Except for law enforcement bodies, images will not be provided to third parties unless as part of a SAR.		
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure, the controller knows to seek advice from the Information Commissioner as soon as such a request is made.		
Regular checks are carried out to ensure that the system is working properly and produces high quality images.		

Date Drafted	23 09 2018
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Version	2
Review date	Sept 2021