



TRUST CCTV POLICY

Beckfoot Thornton

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Approved by Board of Directors			
Version	Date	Description	Revision author
1.0	18/01/2018	Creation of Trust Policy to replace current school CCTV Policies from 25 th May 2018	FW
2.0	25/03/2018	Timescales for storing data confirmed	GAD
3.0	01/03/2019	Amended to provide further clarity on timescales. Slight re-wording.	AMV

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1. Statement of intent

At **Beckfoot Trust**, we take our responsibility towards the safety of staff, visitors and pupils very seriously. To that end, we use CCTV cameras to monitor the members of our local school communities.

The purpose of this policy is to manage and regulate the use of the CCTV system at the Local School and ensure that:

- We comply with General Data Protection Regulations (GDPR).
- The images that are captured are useable for the purposes we require them for.
- We reassure those persons whose images are being captured, that the images are being handled in accordance with data protection legislation.

This policy covers the use of CCTV, drones and other systems, which capture moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes:

- Observing what an individual is doing
- Taking action to prevent a crime
- Using images of individuals that could affect their privacy
- Use in employee investigations
- Use in student behaviour investigations

2. Legal framework

2.1. This policy has due regard to legislation and statutory guidance, including, but not limited to, the following:

- The General Data Protection Regulation (GDPR)
- The Freedom of Information Act 2000
- 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 Local School Standards and Framework Act 1998
- The Children Act 1989
- The Children Act 2004
- The Equality Act 2010

2.2. This policy will also have regard to the following statutory and non-statutory guidance:

- Home Office (2013) 'The Surveillance Camera Code of Practice'
- Information Commissioner's Office (2017) 'Overview of the General Data Protection Regulation (GDPR)'
- Information Commissioner's Office (2017) 'Preparing for the General Data Protection Regulation (GDPR) 12 steps to take now'

- Information Commissioner's Office guidance on Drones (www.ico.org.uk)
- 2.3. This policy operates in conjunction with the following Trust and Trust school policies and procedures:
- Trust Online Safety, ICT and Social Media Policy
 - Trust Child Protection and Safeguarding Policy
 - Trust GDPR, Data Protection and Freedom of Information Policy
 - Trust Records Management Policy
 - Trust Data Subject Access Procedure
 - Trust Data Protection Impact Assessment Procedure
 - Trust Data Breach Management Procedure

3. The data protection principles

3.1. Data collected from CCTV will be:

- Automatically overwritten after 2 weeks. If the CCTV footage is used in an investigation, it will be stored securely and disposed of when the investigation is closed (*or as soon as the data has been securely sent/given to a third party such as the police*).
- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. (*Further processing for archiving in the public interest, scientific, historical research or statistical purposes shall not be considered to be incompatible with the initial purposes. Schools must discuss and record the justification for any such storage of CCTV images with the Trust Compliance Officer before it takes place.*)
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up-to-date; every reasonable step will be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods, insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

- The use of drones is prohibited unless express permission has been sought from the Associate Director of Estates for estates related use (e.g. roof surveys) and Trust Compliance Officer for educational or other use, who will undertake the appropriate Data Protection Impact Assessment.

Appropriate signage is placed on school grounds to alert individuals that CCTV is in operation on our premises.

4. Objectives

4.1. The CCTV system will be used to:

- Maintain a safe environment.
- Ensure the welfare of pupils and staff.
- Deter criminal acts against persons and property.
- Assist the police in identifying persons who have committed an offence.
- Assist in student behaviour incidents
- Assist in providing evidence for employee investigations

5. Protocols

- 5.1. The CCTV system is included in the Trust's registration with the ICO.
- 5.2. The CCTV system is a closed digital system, which does not record audio.
- 5.3. Warning signs have been placed throughout the premises where the CCTV system is active, as mandated by the ICO's Code of Practice.
- 5.4. The CCTV system has been designed for maximum effectiveness and efficiency; however, the local school cannot guarantee that every incident will be detected or covered and 'blind spots' may exist.
- 5.5. The CCTV system will not be trained on individuals unless an immediate response to an incident is required.
- 5.6. The CCTV system will not be trained on private vehicles or property outside the perimeter of the local school.

6. Security

- 6.1. Access to the CCTV system, software and data will be strictly limited to authorised operators and will be password protected.
- 6.2. The local school's authorised CCTV system operators are:
 - Andy Halliley, assistant headteacher.
 - John Hancock, site manager.
- 6.3. The main control facility is kept secure and locked when not in use.

- 6.4. If covert surveillance is planned, or has taken place, copies of the Home Office's [authorisation forms](#) will be completed and retained. This must not take place as a matter of course and must also be discussed with the Trust Compliance Officer.
- 6.5. CCTV systems will be properly maintained at all times.
- 6.6. Visual display monitors will be located in secure areas (i.e. a lockable office) and only accessed by authorised persons. The screens must not be easily viewable by pupils or members of the public.

7. Privacy

- 7.1. Live and recorded materials will only be viewed by authorised operators for the purpose of investigating incidents.
- 7.2. Images may be released to the police for the detection of crime in line with data protection legislation.
- 7.3. Viewings of images by the police will be recorded on the Trust (local school version) Data Subject Access Request Register and authorised by the school GDPR Lead upon receipt of a valid request. The school GDPR Lead should seek guidance from the Trust Data Protection Officer if necessary.
- 7.4. Data Protection Impact Assessments will be conducted for any new or additions or alterations to CCTV systems in local schools.
- 7.5. In the event of a data breach, the school must follow the Trust Breach Management Procedure.

8. Code of practice

- 8.1. The local school understands that recording images of identifiable individuals constitutes as processing personal information, so it is done in line with data protection principles.
- 8.2. The local school notifies all pupils, staff and visitors of the purpose for collecting CCTV images via this policy, privacy notices and a notice in school Reception areas.
- 8.3. CCTV cameras are only placed where they do not intrude on anyone's privacy and are necessary to fulfil their purpose.
- 8.4. The local school has a CCTV surveillance system for the purpose of the prevention and detection of crime and the promotion of the health, safety and welfare of staff, pupils and visitors. The images may also be used for student behaviour incidents and the employee investigation purposes.
- 8.5. The CCTV system is owned By Beckfoot Thornton School and images from the system are strictly controlled and monitored by authorised personnel only. **Please note:** *Where the CCTV system is owned and operated by a third party e.g. facilities management on site contractor, a Data Sharing Agreement must be in place and privacy risks must be outlined in the CCTV Data Protection Impact Assessment.*
- 8.6. The local school will ensure that the CCTV system is used to create a safer environment for staff, pupils and visitors to the local school, and to ensure that its operation is consistent

with the obligations outlined in data protection legislation. The policy is available from the local school's website.

8.7. The CCTV system will:

- Only be used for the purpose specified, which has a lawful basis.
- Be designed to take into account its effect on individuals and their privacy and personal data.
- Be transparent and include a local school contact point, through which people can access information and submit complaints.
- Have clear responsibility and accountability procedures for images and information collected, held and used.
- Have defined policies and procedures in place, which are communicated throughout the local school.
- Restrict access to retained images and information with clear rules on who can gain access.
- Consider all operational, technical and competency standards, relevant to a CCTV system and its purpose, and work to meet and maintain those standards in accordance with the law.
- Be subject to stringent security measures to safeguard against unauthorised access.
- Be regularly reviewed and audited to ensure that policies and standards are maintained.
- Only be used for the purposes for which it is intended, including supporting public safety, protection of pupils and staff, and law enforcement.
- Be accurate and well maintained to ensure information is up-to-date.

9. Access to recorded images

- 9.1. Under the General Data Protection Regulations, individuals have the right to obtain confirmation that their personal information is being processed. Please refer to the Trust GDPR, Data Protection and FOI Policy for further information.
- 9.2. All requests for CCTV images must be recorded on the Trust CIT or Trust School Data Subject Access Register (Tab 1 or 2 unless it is an internal request in line with the Trust CCTV Policy e.g. school security issue, student behaviour or human resources purpose, these will be recorded on Tab 4 – Internal CCTV Requests). Please refer to the Trust Data Subject Access Request Procedure for further information.

10. Photography and Videoing for Educational or Events Purposes

Please refer to the Trust GDPR Data Protection and FOI Policy.

11. Monitoring and review

The Trust Compliance Officer will review the Trust version of this policy as appropriate. Local schools must also review the local content as necessary.