



Diocese of Salisbury  
Academy Trust  
*'Beyond expectations for all of God's children'*

## CCTV POLICY

Policy Date: May 2024

Review Date: May 2026

*This policy is to be adapted by each school that has a CCTV system*

## 1 Policy Statement

- 1.1 This policy is to be used by any School within the Trust in relation to any CCTV system operated by them. A key element in the assessment of lawful use of CCTV systems is the privacy impact assessment (PIA) conducted in relation to those systems setting out the justification for the system and its compliance with data protection legislation (see Appendix A). If the School has not conducted such an assessment then this must be conducted now, and this policy amended to take account of the outcome of that assessment. The School should do this with an open mind, including considering whether any existing cameras should be removed or the system modified in any way.
- 1.2 The Diocese of Salisbury Academy Trust (DSAT) uses Close Circuit Television (“CCTV”) within the boundaries of the Trust properties. The purpose of this policy is to set out the position of the Trust as to the need, purpose, management, operation and use of the CCTV at the Trust.
- 1.3 This policy applies to all members of our Workforce, all visitors to the Trust premises and all other persons whose images and audio may be captured by the CCTV system.
- 1.4 This policy takes account of all applicable legislation and guidance, including:
  - 1.4.1 General Data Protection Regulation (“GDPR”)
  - 1.4.2 Data Protection Act 2018 (together the Data Protection Legislation)
  - 1.4.3 CCTV Code of Practice produced by the Information Commissioner
  - 1.4.4 Human Rights Act 1998
- 1.5 This policy sets out the position of the School in relation to its use of CCTV.

## 2 Purpose of CCTV

- 2.1 The Trust uses CCTV for the following purposes:
  - 2.1.1 To provide a safe and secure environment for pupils, staff and visitors
  - 2.1.2 To prevent the loss of or damage to the Trust buildings and/or assets
  - 2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

The Trust believes that CCTV is a necessary provision in order to achieve the purposes listed in 2.1 when staff cannot be in situ to monitor the premises personally at all times.

## 3 Description of system

- 3.1 At **[insert school name]** School there are **[insert no.]** cameras around the school with **[described video/audit recording]** capabilities, the cameras are **[fixed/describe otherwise]**.

## 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 sited in prominent positions where they are clearly visible to staff, pupils and visitors.
- 4.2 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 of the Trust premises are not recorded.

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

## **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 (see Appendix A).
- 5.2 The Trust will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

## **6 Management and Access**

- 6.1 The CCTV system will be managed by the Headteacher
- 6.2 On a day to day basis the CCTV system will be operated by the office staff
- 6.3 The viewing of live CCTV images will be restricted to the SLT
- 6.4 Recorded images which are stored by the CCTV system will be restricted to access by the SLT.
- 6.5 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.
- 6.6 The CCTV system is checked monthly by the Headteacher 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 28 days unless there is a specific purpose for which they are retained for a longer period, including the recording of a specific incident.
- 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 being located in restricted access areas;
  - 7.3.2 The CCTV system being encrypted/password protected;
  - 7.3.3 Restriction of the ability to make copies to specified members of staff
- 7.4 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.

## **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 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 Trust's Subject Access Request Policy.

- 8.3 When such a request is made a member of the SLT will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.
- 8.4 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. Members of the SLT must take appropriate measures to ensure that the footage is restricted in this way.
- 8.5 If the footage contains images of other individuals then the Trust must consider whether:
- 8.5.1 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 either through software or by creating redacted stills;
  - 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 otherwise 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 members of the SLT 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 whom, 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 members of the SLT 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.
- 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 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.

## 10 Review of Policy and CCTV System

- 10.1 This policy will be reviewed every two years.

10.2 The CCTV system and the privacy impact assessment relating to it will be reviewed every two years.

## **11 Misuse of CCTV systems**

11.1 The misuse of CCTV systems could constitute a criminal offence.

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

## **12 Complaints relating to this policy**

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

## APPENDIX A

### CCTV PRIVACY IMPACT ASSESSMENT TEMPLATE

Who will be captured on CCTV?

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

What personal data will be processed?

Facial and body Images, behaviour, conversations and comments (where there is an audio facility).

What are the purposes for operating the CCTV system?

- promoting the health and safety of staff, pupils and visitors;
- protecting the school buildings and school assets, both during and after school hours.
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the Police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and
- ensuring that the school rules are respected so that the school can be properly managed.

What is the lawful basis for operating the CCTV system?

Under the lawful basis of Legitimate Interest, closed circuit television (CCTV) images are used for the prevention, identification and reduction of crime and to monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.

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

The CCTV system is owned and operated by the school and the deployment of which is determined by the school's Headteacher. The CCTV is a standalone system and operated by the school. The CCTV is monitored centrally from the school office by the Headteacher, the Deputy Headteacher and Admin Officer.

Describe the CCTV system, including: 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

The system comprises of 8 fixed cameras around the school. Cameras are sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated. The location of equipment has been carefully considered ensuring that images captured comply with the Data Protection Act. Cameras have been positioned to ensure coverage is restricted to the school premises, including external areas of the school site.

Where signs notifying individuals that CCTV is in operation are located.

Adequate signage is prominently displayed at the entrance to the school property and at other doors where students enter accompanied by adults.

Whether the system enables third party data to be redacted, e.g. - via blurring of details of third party individuals.

Where footage contains images relating to 3rd parties, the school will take appropriate steps to mask and protect the identities of those individuals.

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

A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

In relevant circumstances, CCTV footage may be accessed:

- By the police when we are required by law to make a report regarding the commission of a suspected crime; or
- Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on The school's property, or
- To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the Head teacher in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- To data subjects (or their legal representatives), pursuant to a Subject Access Request or to individuals (or their legal representatives) subject to a court order.
- To the school insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

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

- The images captured by the CCTV system will be retained for a maximum of 35 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.
- The images/recordings will be stored in a secure environment.
- Access will be restricted to authorised personnel.
- Supervising the access and maintenance of the CCTV System is the responsibility of the Head teacher.
- In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above.
- When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

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

- Recorded footage and the monitoring equipment will be securely stored in a restricted area.
- Unauthorised access to that area will not be permitted at any time.
- The area will be locked when not occupied by authorised personnel.
- Access to the CCTV system and stored images will be restricted to authorised personnel only.
- The system can only be accessed by password encryption on authorised devices.
- The system software keeps a log of when the authorised user access the system or stored images

When will this privacy impact assessment be reviewed?

[date]

**Approval:**

This assessment was approved by the Trust Data Protection Officer:

DPO ..... Date .....