



Girls' Learning Trust

# **CLOSED CIRCUIT TELEVISION (CCTV) POLICY**

Approved By: Trust Board  
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## **1. INTRODUCTION AND AIMS**

The Girls' Learning Trust ("The Trust") uses closed circuit television (CCTV) images to provide a safe and secure environment for students, staff and visitors. CCTV surveillance in schools is intended for the purposes of:

- Protecting school buildings and other assets, both during and after school hours
- Promoting the health and safety of staff, students and visitors
- Preventing bullying and in support of general safeguarding measures
- 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
- Ensuring that school rules are respected, so that the schools can be properly managed.

The CCTV system comprises a number of fixed cameras, with the capability to record both sound and images.

The CCTV system is owned and operated by the Trust on behalf of each school. The responsibility for the deployment and management of which is jointly owned by the relevant Headteacher and the Trust's Chief Infrastructure Officer. The introduction of, or changes to, CCTV monitoring will be subject to appropriate consultation with staff and the school community.

All authorised operators, and employees with access to images, must be aware of the procedures that need to be followed when accessing the recorded images and sound. All operators must be trained in their responsibilities under the CCTV Code of Practice. All employees must be aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

## **2. LEGISLATION AND GUIDANCE**

This policy meets the requirements of:

- The Data Protection Act 2018 (DPA 2018) – governing the use of personal data collected via CCTV.
- The UK General Data Protection Regulation (UK GDPR) – the EU GDPR as incorporated into UK legislation, with amendments made by The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020.
- The Protection of Freedoms Act 2012 – particularly relevant to the use of CCTV in public spaces.

It is based on guidance published by the Information Commissioner's Office (ICO) on the use of surveillance cameras, including compliance with the CCTV code of practice.

This policy also reflects the Surveillance Camera Code of Practice issued by the Home Office under the Protection of Freedoms Act 2012 and meets the requirements of the Human Rights Act 1998, specifically regarding the right to privacy.

The policy should be read in conjunction with the following other relevant policies:

- Data Protection and Freedom of Information Policy
- Safeguarding and Child Protection Policy
- IT Policy

- Records Retention Policy
- Staff Code of Conduct

### **3. ROLES AND RESPONSIBILITIES**

This policy applies to all staff and volunteers within the Trust, and to external organisations or individuals working on our behalf.

#### Chief Executive Officer

The Chief Executive Officer has overall accountability for ensuring the policy is adhered to and implemented effectively.

#### Data Protection Officer (DPO)

The Data Protection Officer (DPO) has specific responsibilities related to CCTV:

- Dealing with subject access requests (SAR) in line with legislation, for any disclosure of CCTV footage held by the Trust.
- Ensuring that all staff at each school within the Trust handle and process CCTV footage in accordance with data protection legislation.
- Ensuring that surveillance and CCTV footage is obtained and stored in line with legal requirements and the Trust's Records Retention Policy.
- Ensuring that surveillance and CCTV footage is destroyed in line with legal requirements when it falls outside of its retention period.
- Informing data subjects how their data captured in surveillance and CCTV footage will be used by the Trust, their rights for the data to be destroyed and the measures implemented by the school to protect individuals' personal information.
- Ensuring each school in the Trust has completed a privacy impact assessment (PIA), and a data protection impact assessment (DPIA), to ensure the use of surveillance and CCTV is justified and monitors the risks of using such systems.
- Ensuring that all relevant staff in the Trust understand their responsibilities as set out in the ICO CCTV Codes of Practice.

#### Headteacher and CCTV Lead

In each school, the Headteacher is responsible for identifying and appointing a Lead Person (who may be the Headteacher) to lead the management and supervision of CCTV in the school. This individual must be approved by the Trust's Data Protection Officer.

The role and responsibilities of the Lead Person in each school include:

- Ensuring that this policy is followed by all staff, volunteers and students in the school.
- Arranging training for relevant school staff in consultation with the Trust DPO.
- Identifying staff within the school who will be responsible for the operation and viewing of the CCTV system (who will usually include the relevant Premises Manager and Designated Safeguarding Lead).

#### Chief Infrastructure Officer

The Chief Infrastructure Officer of the Trust is responsible for the overall management of the CCTV infrastructure including:

- The installation, maintenance and upkeep of all hardware.

- The installation and management of all relevant software.
- Ensuring adequate resources are in place within the school to use the CCTV system appropriately.

#### Summary Table

Chief Executive Officer	Overall accountability for ensuring the policy is adhered to and implemented effectively.
Data Protection Officer	Handling subject access requests (SAR) for CCTV footage. Ensuring CCTV footage is obtained, stored, processed and destroyed according to legal requirements. Informing data subjects about the use of their data. Completing privacy and data protection impact assessments. Ensuring compliance with ICO's CCTV Code of Practice.
Headteacher	Appointing a Lead Person to manage CCTV at the school. Ensuring staff, volunteers and students comply with the policy. Organising relevant staff training in consultation with the DPO.
CCTV Lead	Responsible for managing and supervising CCTV operations. Identifying staff authorized to operate and view the CCTV system.
Chief Infrastructure Officer	Managing the CCTV infrastructure. Overseeing the installation, maintenance, and upkeep of CCTV hardware and software.
Premises Manager	Jointly responsible with IT for maintaining CCTV cameras and equipment.

#### **4. LOCATION OF CAMERAS**

Cameras are 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 Trust 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.

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

CCTV will not generally be used in classrooms, but in areas within the school that have been identified as not being easily monitored. If CCTV is placed in classrooms, A DPIA would be completed; this must be approved by the DPO and relevant Headteacher, and parents must be consulted in advance.

Members of staff should have access to details of where CCTV cameras are situated.

The Premises and IT teams in each school are jointly responsible for the upkeep and maintenance of cameras.

#### **5. STORAGE AND RETENTION OF CCTV IMAGES**

Recorded data will not be retained for longer than is necessary, in keeping with the Trust's Records 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.

The Headteacher and Lead Person (if not the Headteacher) in each school are responsible for identifying those permitted to download, store and/or retain CCTV images and/or sound files.

All retained data must be stored securely, with arrangements approved by the Trust DPO.

## **6. ACCESS TO CCTV IMAGES**

The Headteacher and Lead Person in each school are responsible for identifying those permitted to access CCTV images on screen.

A log of any access to view the CCTV recordings will be maintained by the Lead Person in each school, and must include the time and date of access, the name of the authorised person accessing the recordings and the reason for accessing the information. A template for this is provided in Appendix One.

Sharing of CCTV sound and images will be subject to the General Data Protection Regulation 2016 (the GDPR) and the Data Protection Act 2018. All requests for third party access to CCTV data must be addressed to the Data Protection Officer.

## **7. SUBJECT ACCESS REQUESTS (SAR)**

Individuals have the right to request access to CCTV footage relating to themselves under the GDPR and the Data Protection Act 2018. Any individual who requests access to images of themselves will be considered to have made a Subject Access Request.

When a request is made, the Data Protection Officer must be informed. The DPO will then work with the Lead Person in the relevant school to ensure the Trust's SAR Guidance is followed.

A record must be kept and held securely by the DPO of all disclosures, which sets out:

- When the request was received.
- The considerations as to whether to allow access to those images.
- The individuals who were permitted to view the images, recording the date and time.
- Whether a copy of the images was provided, if so to whom and the format of the information.

## **8. COMPLAINTS**

Complaints and enquiries about the operation of CCTV within the school should be directed in the first instance to the Headteacher, who will consult with the Data Protection Officer, and act in accordance with the Trust Complaints Policy and Procedures.

