CCTV Policy

Policy approved by	Local Governing Committee on 22.05.2023
Next Review Date	Summer 2025

Contents

1. Introduction

The purpose of this policy is to regulate the review, management, operation, and use, of closed-circuit television (CCTV) on the Brian Clarke Academy site. CCTV is in use to increase personal safety of students, staff and visitors and to prevent the loss or damage to property.

This Code follows Data Protection Act guidelines and will be subject to review every 2 years. Governors review all changes, and the policy is published on the school website for access by all stakeholders. Paper copies are available on request. Any significant changes will be by consultation with parents and governors.

2. The system

The CCTV system is owned by the school and comprises 19 external and 33 internal cameras located throughout the school site (Appendix 1). The cameras do not record sound. All cameras are monitored from the Site Team office and members of the senior leadership team have access as required.

3. Statement of intent

3.1 The CCTV Scheme is registered annually with the Information Commissioner's Office (ICO) by the Trust under the terms of the Data Protection Act 2018. The school treats the system and all information, documents and recordings obtained and used as data which are protected by Data Protection and GDPR legislation and the Commissioner's Code of Practice.

3.2 Cameras are used to monitor activities across the school site for the purpose of securing the safety and well-being of the pupils, staff and visitors and to identify criminal activity actually occurring, anticipated, or perceived.

3.3 Staff have been instructed that static cameras are not to focus on private homes, gardens or other areas of private property.

3.4 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. CCTV data will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. CCTV data will never be released to the media for purposes of entertainment.

3.5 Where CCTV has captured evidence of criminal behaviour related to the school or its environs the footage can only be issued in disk format for officers to remove from site for investigative purposes if they present a completed DP7 form (previously a Section 29 form)

3.6 It is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage.

4. System Equipment & Control

4.1 CCTV signage is displayed at site and building entrances where appropriate.

4.2 The system runs 24 hours per day for the full year.

4.3 The Site Manager will ensure that the CCTV system is fully functioning, giving priority to any equipment requiring maintenance. If out of hours emergency CCTV maintenance arises, the site team representative must be satisfied of the identity and purpose of contractors before allowing the maintenance works to commence.

4.4 Unless there is a valid (Headteacher approved) need for surveillance, cameras will not be specifically directed at an individual or a specific group of individuals.

4.5 Visitors must not be given access to locations where CCTV footage is displayed without good reason. The site team must satisfy themselves of the identity of any visitors to their office and the purpose of the visit. Where any doubt exists access will be refused.

4.6 Casual visits to view CCTV will not be permitted. Any external stakeholders (e.g. police) must obtain prior permission from the Headteacher or their nominated representative and must be accompanied throughout the visit.

4.7 All requests to view CCTV are logged on the central file.

5. System access

5.1 Access to CCTV footage is restricted. On occasion, other members of staff may be asked to review footage where images are under investigation, to aid with identification.

5.2 General access is restricted to senior leaders and the site team, however other members of staff may be required at times to view footage.

5.3 The school receptionist has access to site entrance points CCTV footage for safeguarding purposes in order to admit visitors to site.

5.4 Any covert surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with school policies and procedures and must be authorised by the Headteacher.

5.5 The school keeps a record of instances where CCTV footage is accessed. This record is securely stored within the SLT folder of SharePoint, with access restricted to senior leaders and site staff, as well as authorised members of the trust's central team where appropriate for monitoring purposes.

The school records the following information:

5.5.1 Date of access

5.5.2 Person accessing the footage

5.5.3 Period of footage accessed

5.5.4 Which zone/s within school have been viewed

5.5.5 Reason for viewing

5.5.6 Whether the footage is to be saved and for what reason

5.5.7 Any authorised external parties requiring the data (e.g. police)

5.5.8 Date of collection by authorised external parties

6. Image storage and sharing procedures

6.1 CCTV footage is retained for 10 days, after which it is automatically overwritten. If footage or images are required to be saved as evidence, the following procedures apply:

6.1.1 The required footage (digital or hard copy) will be stored securely in a restricted access location. Access to the data must be updated on the school's central log.

6.1.2 Only the footage required will be saved, any excess material must be deleted.

6.2 Any external requests to view CCTV data must be in writing to the Headteacher and where appropriate must be accompanied by the appropriate request form from the relevant agency.

6.3 The central log must be updated where data is released to an external authorised party and the person collecting must sign a release form (Appendix 2).

6.4 Where data is released externally, it remains the property of the school and must be treated in accordance with this policy. The school also retains the right to refuse permission where there is a valid reason to do so.

7. Subject Access Requests

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

7.2 All requests should be made in writing to the Headteacher and should provide sufficient information to enable the footage to be identified, e.g., date, time, location.

7.3 The school reserves the right to refuse access to CCTV footage where this would prejudice the rights of other individuals or jeopardise and ongoing investigation.

7.4 Where still images are provided, the images of others within the frame must be obscured to prevent identification.

8. Breaches

8.1 Any breach of this policy will be investigated by the Headteacher or their nominee and could lead to disciplinary action including dismissal. All breaches must be reported to the Chief Operating Officer of the trust.

8.2 A serious breach may warrant an independent investigation and notification to the ICO. Decisions regarding what constitutes a serious breach is determined by the Chief Operating Officer in liaison with the Data Protection Officer.

8.3 All breaches must be documented on the trust's central record, with remedial action and changes to procedures as a result of the breach recorded and actioned.

9. Assessment of the scheme and code of practice

Performance monitoring, including random operating checks, may be carried out by the Chief Operating Officer or their deputy.

10. Complaints

Complaints should be addressed to the Headteacher.

11. Cross references

Behaviour Policy

Complaints Policy

Data Protection Policy

Health and Safety Policy

Safeguarding Policy

Appendix 1: Camera locations

No	Location / Coverage
External	
1	Loading bay
2	Cycle store
3	Cycle store path
4	Cycle store path entrance
5	Pedestrian access
6	Main staff entrance
7	Pedestrian crossing
8	Steps to student entrance
9	Car park entry barrier
10	Car park and all-weather pitch 1
11	Car park exit barrier
12	Car park and all-weather pitch 2
13	All-weather pitch
14	Delivery gate
15	Sports hall and play area
16	Sports hall and delivery zone
17	Sports hall front terrace
18	Student entrance front terrace
19	Hall front terrace
Internal	
1	Ground floor stairwell
2	PE Corridor
3	DT corridor
4-8	Restaurant
9-10	Music corridor
11	Drama corridor
12	Hall corridor
13	Ground floor stairwell
14	First floor stairwell
15-18	Art / ICT corridor
19-20	Visitor entrance
21	First floor stairwell
22	Second floor stairwell
23-26	English / Humanities corridor
27	Second floor stairwell
28	Third floor stairwell
29-32	Maths and science corridor
33	Third floor stairwell

Appendix 2: CCTV Data Release Form (for external/third party requests)

CCTV data can only be released with prior permission by the Headteacher and upon receipt of a formal, authorised request from the third party

Data reference:

Collected by:

Signature:

Name:

Organisation:

Contact details (email / phone):

Released by (BCS):

Date released:

All completed forms to be scanned and saved in the CCTV Microsoft Teams folder