



# Aletheia Anglican Academies Trust

## Sutton-at-Hone CE Primary School

### CCTV Policy

<b>Review Body:</b>	Board of Trustees
<b>Leadership Group Responsibility:</b>	Chief Operating Officer / Data Protection Officer
<b>Policy Type:</b>	Statutory
<b>Adopted:</b>	December 2020
<b>Date of Next Review:</b>	December 2022
<b>Review Period:</b>	2 Years

This procedure was adopted by the Board of Trustees of Aletheia Anglican Academies Trust, for implementation in all Trust academies on the date above and supersedes any previous CCTV Policy.

## **1. Introduction**

- 1.1 The purpose of this policy is to regulate management, operation and use of closed-circuit television (CCTV) within the Aletheia Anglican Academies Trust.
- 1.2 This policy adheres to guidelines from the Information Commissioners Office (ICO) CCTV Code of Practice.
- 1.3 CCTV systems are operated and monitored by the Premises Team (at individual schools) and IT Services.

## **2. Aims**

- 2.1 Increase the personal safeguarding of staff, students, and visitors.
- 2.2 Reduce property loss and strengthen theft detection and prevention.
- 2.3 Support the Police and other law-enforcement agencies.
- 2.4 Protect buildings, property, and other assets.
- 2.5 Support disciplinary or grievance procedures (subject to the confidentiality requirements).

## **3. Data Protection**

- 3.1 The use of CCTV and the associated images and any sound recordings is covered by the Data Protection Act 2018.
- 3.2 The Trust will comply with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published here: <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>.
- 3.3 In line with the Data Protection Act 2018, the Trust will provide sufficient notification to persons, when entering school premises, that areas are monitored and recorded by CCTV.

## **4. Camera Location**

- 4.1 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.
- 4.2 Each site will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act 2018.
- 4.3 Cameras are positioned so that their coverage is restricted to the site premises, which may include outdoor areas.
- 4.4 Members of staff have access to details of where CCTV cameras are situated.
- 4.5 Signs are placed so that students, staff, and the public are aware that they are entering a zone which is covered by surveillance equipment or live monitoring.
- 4.6 The purpose of the use of CCTV is displayed – e.g. "CCTV in operation for your safety and security".

## 5. Storage and Retention

- 5.1 Recorded footage will not be retained for longer than is necessary. 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.
- 5.2 Recordings are retained for 15 days unless a recording is required for further investigation, usually by the Police.
- 5.3 All retained footage is stored securely and access to recorded images is restricted to those staff authorised to view them. Access will not be provided to unauthorised staff.

## 6. Live Monitoring

- 6.1 Office and reception staff retain the right to observe live footage of designated cameras that allow views of otherwise obscured areas of interest which include entrance gates, pedestrian gates, reception desks and waiting areas.
- 6.2 No other cameras other than the designated cameras will be accessible for live monitoring and no recorded footage will be accessible to unauthorised personnel.

Staff Access Rights (subject to CCTV system installed)			
Name	Technical	View: Live	View: Recorded
Finance Manager			✓
IT Services	✓	✓	✓
Leadership		✓	✓
Office / Reception		✓*	
Pastoral Team			✓
Premises		✓	✓

\* only designated CCTV cameras (6.1).

## 7. Maintenance

- 7.1 Schools must report immediately any CCTV related concerns and issues to IT Services.
- 7.2 Where logistically possible, IT Services are responsible for ensuring regular checks are carried out, including:
- Checking any saved footage is not older than 15 days and delete accordingly
  - Checking sample footage can be retrieved and is playable
  - Checking the cameras and equipment are operating properly
  - Determining if equipment is no longer technologically fit-for-purpose and should be upgraded
  - Ensuring any special features are accurate (e.g. error reporting and time display)

## **8. Subject Access Requests (SARs)**

- 8.1 Individuals have the right to request access to CCTV footage relating to themselves.
- 8.2 All requests should be made in writing to the Headteacher of the school concerned. Individuals submitting requests for access will be asked to provide sufficient information (e.g. date, time and location) to enable footage relating to them to be sourced and identified.
- 8.3 Identification will need to be confirmed before any footage is transmitted or retrieved to ensure no personal data is transmitted to a third party.
- 8.4 Any disclosed footage must either transmitted via secure digital transfer or through protected physical media such as an encrypted USB drive.
- 8.5 The Trust will respond to requests within 30 calendar days of receiving the written request and proof of identity.
- 8.6 The Trust will review requests on an individual basis and reserves the right to refuse access for excessive amounts of CCTV footage, or if a request would prejudice the legal rights of other individuals / jeopardise an investigation.
- 8.7 There will be no disclosure of recorded footage to third parties, other than to authorised personnel such as the Police and service providers to the Trust.

## **9. Complaints**

- 9.1 Complaints and enquiries about the operation of CCTV within the Trust should be directed to the Headteacher.