



**Shaw
Education
Trust**

Use of Closed-Circuit Television (CCTV)

Document Owner:	Chris Spender
Approved By:	C-Suite
First Publication Date:	October 2022
Last Review Date	October 2022
Audience:	All

Contents

- 1. Policy Principles**
 - 2. Purpose and Aims**
 - 3. Data Protection Legislation**
 - 4. (INSERT NAME) Academy Policy Statement**
 - 5. Policy and Procedure**
 - 5.1 General Points**
 - 5.2 Signage**
 - 5.3 Retention of Data**
 - 5.4 Positioning of Cameras**
 - 5.5 Security**
 - 5.6 Covert Monitoring**
 - 5.7 Access to CCTV Images**
 - 5.6.1 Subject Access Requests**
 - 5.6.2 Third Party Access**
 - 5.8 Complaints**
- Appendix One Checklist of CCTV Operation**
- Appendix Two CCTV Agreement (for Authorised Operators)**



1. Policy Principles

At the Shaw Education Trust, our actions and behaviours as employees are guided by our core values;

TO BE PUPIL AND PEOPLE CENTRED

To ensure everything we do realises the full potential of the pupils we are here to help. We will provide caring, tailored and supportive environments where young people can flourish. We will ensure that all members of the school community are the focus of our activity and as servant leaders we shall enable their success.

TO ACT WITH INTEGRITY

To be an organisation that is open and transparent, actively embraces equality and diversity and has an honest, inclusive and respectful culture which everyone can trust.

TO BE INNOVATIVE

To be a creative, forward-thinking organisation that finds new ways of doing things. To break down barriers to learning, stimulating exciting futures and securing independent living. We will be relentless in our pursuit of the excellence which has the power to change lives.

TO BE BEST IN CLASS

To be a top performing education provider that helps every single pupil on their journey towards achieving their potential. We believe our staff are our greatest asset. We will support leaders, teachers and staff to provide exceptional teaching, learning and outcomes.

TO BE ACCOUNTABLE

Shaw Education Trust, its schools and staff are accountable to our pupils and stakeholders. We will demonstrate personal responsibility by carrying out our roles to the best of our ability and in adherence with our values.

2. Purpose and Aims

The purpose of the policy is to clarify and regulate the operation and use of CCTV systems within all academies of the Shaw Education Trust. The Shaw Education Trust uses closed circuit television images to;

- a) Detect, prevent and reduce crime and loss or damage to property.
- b) Monitor academy / trust buildings to provide a secure environment for the safety and security of employees, pupils and visitors.
- c) To assist in the investigation of suspected breaches of the academy / trust policy and regulations by employees and pupils.

Cameras will be positioned so that they only capture images for the purposes described above for which they are used. The academy trust seeks to operate its CCTV system in a manner that is consistent with respect for an individual's privacy.

The policy aims to reassure those people whose images are being captured that these images are being handled appropriately and safely in accordance with data protection principles.

3 Data Protection Legislation

The school complies with the Information Commissioner's Office (ICO) The Surveillance Camera Code of Practice (PoFA 2012) to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:

[Update to Surveillance Camera Code of Practice - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

The use of CCTV, and the associated images, is covered by the General Data Protection Regulations (GDPR) 2018. This policy outlines the school's use of CCTV and how it complies with the regulations.

The General Data Protection Regulation require that personal data shall be;

- a) Processed lawfully, fairly and in a transparent manner,
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes,
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed,
- d) Accurate and, where necessary, kept up to date,
- e) Kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data is processed,
- f) 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.

4. (INSERT NAME OF SCHOOL) Policy Statement

It is the responsibility of each academy to insert information into the document where indicated and for completing and updating the 'Checklist of CCTV Operation' contained in Appendix One. Each individual academy (usually the data controller) will be required to notify the Information Commissioner about the CCTV system and its purpose. CHECK – INDIVIDUAL ACADEMY OR CENTRALLY? Academies to agree completed CCTV policy with Academy Councils.

- 4.1 **(INSERT ACADEMY NAME)** Academy uses closed circuit television (CCTV) on its premises and buildings for the purposes as clarified in Section 2. Purpose and Aims (above).
- 4.2 The system comprises of **(INSERT HOW MANY CAMERA)** cameras. The trust academy uses **(INSERT DETAILS OF CAMERAS E.G. FIXED OR DOME)**. The **(INSERT ACADEMY NAME)** has CCTV cameras positioned in the following locations; **(INSERT CAMERA LOCATIONS)**.
- 4.3 Cameras will be 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 academy will ensure that the location of equipment is carefully considered to ensure that images captured comply with GDPR. The planning and design of the system should minimise the invasion of privacy and cameras will not be located in any areas which are reasonably expected to be private for example toilets or changing rooms.
- 4.4 The system ***does / does not** have sound recording capability. **(*DELETE AS APPLICABLE)**
- 4.5 The CCTV system owned and operated by the academy **(OR STATE ALTERNATIVE AS APPLCABLE)** and the deployment of which is determined by the academies leadership team in consultation with the Academy Council.
- 4.6 The CCTV system is monitored from **(INSERT LOCATIONS)** by **(INSERT NAME/ POSITION OR THIRD PARTY IF REMOTELY MONITORED)**
- 4.7 The introduction of, or changes to, CCTV monitoring will be shared with staff and the community and agreed with the Academy Council.
- 4.8 Usage of the CCTV systems, software and data will be strictly limited to authorised operators. All authorised operators and employees approved to access images are aware of the procedures that need to be followed when accessing CCTV images. All operators have been trained in their responsibilities. All employees are aware of the restrictions in relation to the storage, access and disclosure of CCTV images. All authorised operators are required to sign the CCTV Agreement contained in appendix two of this policy.
- 4.9 Any breaches or concerns in respect of this policy will be reported to the Data Protection Officer (DPO). CCTV systems and their security is audited annually as part of school's data protection arrangements.

5. Policy and Procedure

5.1 General Points

All images and sound recorded by CCTV systems shall remain the property and copyright of the Shaw Education Trust.

Only suitably trained and competent staff or contractors with the relevant knowledge and experience will be employed to install and maintain equipment.

5.2 Signage

It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. All academies in the trust will ensure adequate signage to meet this requirement including at all entrances of an academy with CCTV.

5.3 Retention of Data

Recorded data will not be retained for longer than is necessary with reference to the purpose of CCTV surveillance. While retained, the integrity of the recordings will be securely maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

Unless required for evidential purposes, the investigation of an allegation or as required by law, CCTV images will be retained for no longer than 30 days from the date of recording.

5.4 Positioning of Cameras

Cameras will be sited so they only capture images relevant for the purposes for which they are installed which is confirmed in Section 2. of this policy. Images of visitors as well as pupils and staff will be captured as part of the CCTV systems surveillance. However, the planning and design of the system should minimise the invasion of privacy in their use for their stated purpose. Cameras will not be located in any areas which are reasonably expected to be private for example toilets or changing rooms.

5.5 Security

All images shall be stored securely in an encrypted format. Any unnecessary footage captured will be securely deleted from the system or overwritten.

5.6 Covert Monitoring

Covert monitoring should not normally be considered, and should only be used in exceptional circumstances, for example;

- a) Where there is good cause to suspect criminal activity or equivalent malpractice which may constitute gross misconduct.
- b) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances HR must be involved in the decision and written authorisation must be obtained from a member of the Academy Council.

5.7 Access to CCTV Images

Access to recorded images will be restricted to those staff authorised to view them by the Principal in consultation with HR and statutory requirements. A list of staff authorised to view CCTV images will be maintained by the

academy within the 'Checklist of CCTV Operation' contained in appendix one. The academy will maintain a log of when CCTV is accessed and viewed.

5.7.1 Subject Access Requests

Individuals have the right to request access to CCTV footage relating to themselves.

All requests must be made in writing to the Principal. Sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

The Academy will respond to requests within 30 calendar days of receiving the written request. The academy must verify the identity of the person making the request before any information is supplied. This must be done in person with appropriate identification documents for example a passport or driving licence.

Where a request has been made electronically, the information will be provided in a commonly used electronic format.

Information will be normally supplied to the individual free of charge. However, the academy will charge a reasonable fee where a request is manifestly unfounded, excessive or repetitive.

The Trust / academy reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation. Where images of other individuals are on the CCTV footage their permission will be sought before this is allowed.

5.7.2 Third Party Access

There will be no disclosure of recorded data to third parties other than to authorised bodies such as the police.

The data may be used within the trust / academies HR policies for example discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

5.8 Complaints

Enquires or complaints about the operation of CCTV within the academy should be made in accordance with the SET Complaints Policy and Procedure.

Failure of authorised operators to comply with the requirements of this policy will lead to disciplinary action under the Trusts / Academy's Disciplinary Policy.

Appendix One

Checklist of CCTV Operation

The academy's CCTV system and the images produced are controlled in line with this policy and relevant legislation. The academy data controller (INSERT NAME) will notify the Information Commissioner about the CCTV system and its purpose.

As part of this the data controller will complete and review annually the Checklist of CCTV Operation. The Academy leadership team in conjunction with the academy council have responsible for ensuring compliance with the provisions set down in this policy and its appropriate implementation and communication.

ACTION	NAME	DATE	REVIEW DATE
Notification submitted to the Information Commissioner and the next renewal date recorded.			
The name of the person(s) responsible for the operation of the system is; _____			
The reason for using CCTV has clearly been defined and installation / use of cameras is an appropriate solution.			
The system is checked to verify it produces clear images which law enforcement bodies can use to investigate crime, these can easily be taken from the system when required.			
Employees and visitors are consulted and informed about proposed installation and / or continued use of CCTV.			
The potential impact on privacy has been identified and taken into account with reference to its purpose.			

ACTION	NAME	DATE	REVIEW DATE
Cameras are located in the following areas;			
Cameras have been positioned to avoid intentionally capturing the images of persons not visiting the premises.			
The academy has adequate and visible signage showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the signs.			
<p>Images from this CCTV system are securely stored in _____</p> <p>and access is limited to the following authorised persons;</p>			
Recorded images will be deleted after 30 days, unless they form part of an issue under investigation.			
Regular checks are carried out to ensure that the system is working properly and produces clear images.			

Appendix Two

CCTV Agreement (for Authorised Operators)

Name: _____

Role: _____

Please tick the box to indicate you agree to act in accordance with the statement.

Unless explicitly told to do so by the DPO, staff members with access to the school's CCTV footage:

- Will not share footage with others.
- Will not allow others access to footage.
- Will not download footage.
- Will not remove CCTV data from the room in which it is stored.
- Will not leave the storage room unlocked or unsecured.

Signature: _____

Date: _____



Shaw Education Trust

Shaw Education Trust Head Office,
Kidsgrove Secondary School,
Gloucester Road,
Kidsgrove,
ST7 4DL

Twitter	@ShawEduTrust
LinkedIn	@ShawEducationTrust
Call	01782 948259
Email	info@shaw-education.org.uk
Visit	shaw-education.org.uk

**Pupil &
people
centred**

**Act with
integrity**

**Be
innovative**

**Be best
in class**

**Be
accountable**