



# Thrunscoc Primary Academy

## CCTV and Surveillance Policy

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### 1. Purpose

The Purpose of this policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) and door entry surveillance at Thrunscoc Primary Academy.

CCTV systems are installed externally on the premises for the purposes of enhancing security of the building and its associated equipment as well as for the safety and wellbeing of the academy's pupils and staff.

CCTV surveillance at the Academy is intended for the purposes of:

- protecting the academy buildings and academy assets, both during and after academy hours;
- promoting the health and safety of staff, pupils and visitors;
- 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
- The system does not have sound recording capability.

The CCTV system is owned and operated by the academy, the deployment of which is determined by the academy's leadership team.

All authorised users with access to images are aware of the procedures that need to be followed when accessing the recorded images and are aware of the restrictions in relation to access to, and disclosure of recorded images.

## **2. Scope**

This policy relates directly to the location and use of CCTV and the Inventory door entry surveillance system. The monitoring, recording and subsequent use of recorded images complies with the Information Commissioner's Office (ICO) CCTV Code of Practice.

The Code of Practice is published at: <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

CCTV warning signs will be clearly and prominently placed at the main external entrance to the Academy and in the main reception area.

The CCTV system is designed to cover all external doors and windows, entrance gates, car parks, the boundary fence by the neighbouring community facility but it is not guaranteed that the system will cover or detect every single incident taking place in the areas of coverage.

The Inventory door entry system covers the signing in screen and immediate area in the main reception.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

CCTV monitoring of public areas for security purposes within academy premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulation and Data Protection Act 2018.

## **3. Location of cameras**

The cameras are sited to capture images relevant to the purposes for which they have been installed (as described above) and there is some overlap onto pavements and the neighbouring community facility. Care will be taken to ensure that reasonable privacy expectations are not violated. Due to the strobe effect of the security railings, passers-by are not identifiable (verified by Humberside Police).

## **4. Covert monitoring**

The academy retains the right in exceptional circumstances to set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or serious unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances, authorisation must be obtained beforehand from the chair of governors.

Covert Monitoring may take place in classrooms when circumstances as above are satisfied. Covert

Monitoring used in classrooms will never be used to observe or assess a teacher's professional performance, or to contribute to capability proceedings.

Covert Monitoring will cease following completion of an investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example, toilets.

## **5. Storage and retention of surveillance images**

### **CCTV**

Recorded data on the CCTV systems will not be retained for longer than 30 days except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

Where data is retained for longer than 30 days, it will be kept in an electronic file the academy's server within a restricted access drive. This will be limited to specific CCTV image/recordings required for criminal or security matters. Images be recorded onto an external drive, eg. DVD or memory stick, when instructed to do so by the police or a court order.

The Data Protection Act and GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention will reflect the academy's purposes for recording information, and how long it is needed to achieve this purpose.

### **Inventry door entry system**

Photographs on the academy's door entry system are retained while the person's details remain in the system.

Any images linked to signing in/out of pupils are removed from the system when the pupil leaves the academy.

Visitors details may be removed at their request if they no longer visit the academy.

These images are retained for safeguarding and child protection. They can only be viewed via the Inventry system by the admin staff and headteacher at the academy.

The Academy will store data securely at all times.

## **6. Access to surveillance images**

Access to recorded images will be restricted to authorised staff and will not be made widely available. The authorised staff are the headteacher, business manager and caretaker. The academies approved company for CCTV maintenance also has access to the images and Data Protection Statements are in place.

Supervising the access and maintenance of the CCTV System is the responsibility of the business manager.

When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

## **7. Subject Access Requests (SAR)**

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the GDPR.

All requests should be made in writing to the Data Protection Lead who can be contacted by email to [office@tp.nelcmail.co.uk](mailto:office@tp.nelcmail.co.uk).

Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location.

The academy will respond to requests within 30 days of receiving the request but if a request is received outside of the academy term this may not be possible.

The academy reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

## **8. Access and disclosure of images to third parties**

There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police and service providers to the academy where these would reasonably need access to the data (e.g. investigators).

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.

Requests for images should be made in writing to the Data Protection Lead.

The data may be used within the academy's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

## **9. Responsibilities**

The headteacher will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy.
- Maintain a record of access for the release of tapes or any material recorded or stored in the system.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the academy and be mindful that no such infringement is likely to take place.
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.

## **11. Policy review**

The Data Protection Lead is responsible for monitoring and reviewing this policy. This policy will be reviewed every two years. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

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Policy date: May 2022

Approved by the Resources Committee of the Governing Body on: 15th June 2022

Next review date: May 2024