

# **CCTV** Policy

#### Statement of Intent

The Poppy Academy Trust is committed to improving the life chances of all our children. We will nurture a passion for learning to enable them to thrive in an ever-changing world.

We have shared values across the Trust which we teach explicitly and throughout the curriculum to the children. At our Church school, these values are rooted in our Christian ethos and distinctive Christian character.

This is reflected in all our relationships between staff, children, parents, governors and the local community. It is reflected in how we teach, what and how our pupils learn within and beyond the classroom.

CCTV Policy		
Written by:	Clare Sauvé	
Date:	16.04.22	
Approved by:	Resources	
Date:	26.04.22	
Review frequency:	Every 3 Years	
Target Audience:	All stakeholders	

Our Local Governing Bodies are dedicated to the promotion of high standards of educational achievement. We are committed to eliminating discrimination, advancing equality of opportunity and fostering good relations between different groups. These factors were considered in the formation and review of this policy and will be adhered to in its implementation and application across the whole school community.

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## 1. Aims

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System in our schools. It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the School and members of the public) regarding their rights in relation to personal data recorded via the CCTV system. This policy will be subject to review every 3 years, and should be read with reference to the Data Protection Act 1998 (the Act) and the General Data Protection Regulation 2016 (GDPR), the School's Data Protection Policy and the Information Commissioner's CCTV Code of Practice.

All fixed cameras are in plain sight on the School premises and the Schools do not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds. Data captured for the purposes below will not be used for any commercial purpose.

# 2. Objectives of the system

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety
- To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public
- To support the police in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- To monitor the security of the site.
- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the School's Behaviour Policy, which is available to parents on request

# 3. Positioning

- Locations have been selected that the Schools reasonably believe require monitoring to address the stated objectives
- Warning signs are placed in prominent positions to inform anyone entering the area, such as pupils, staff, volunteers, visitors and members of the public that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system

• No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.

#### 4. Maintenance

- Locations have been selected that the School reasonably believes require monitoring to address the stated objectives.
- Warning signs are placed in prominent positions to inform anyone entering the area, such as pupils, staff, volunteers, visitors and members of the public that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.
- No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.

#### 5. Supervision of the system

- Staff authorised by the School to conduct routine supervision of the System may include the caretaker, office staff and the leadership team.
- Images will be viewed and/or monitored in a suitable environment where it is unlikely they will be
  accessed or inadvertently viewed by unauthorised persons.

### 6. Storage of Data

The system is administered and managed by the School, who will act as the Data Controller. The day-to-day management of images will be the responsibility of the Heads of Schools.

Images will be stored for two weeks, and automatically over-written unless the Schools consider it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.

Where such data is retained, it will be retained in accordance with the Act and our Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded in the system log book.

## 7. Access to Images

Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager (Executive Headteacher), in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access). The Executive Headteacher may delegate this responsibility to the Heads of Schools or the School Caretaker.

The System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV images:

• Where required to do so by the Leadership Team, the Police or some relevant statutory authority and in accordance with the law;

- To make a report regarding suspected criminal behaviour;
- To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- To assist the School in establishing facts in cases of unacceptable student behaviour, in which case the parents/guardian will be informed as part of the School's management of a particular incident;
- To data subjects (or their legal representatives) pursuant to an access request under the Act provided that the time, date and location of the recordings is furnished to the School (see the Data Protection Policy);
- To the School's insurance company where required in order to pursue a claim for damage done to insured property;
- In any other circumstances required under law or regulation.

Where images are disclosed a record will be made in the system log including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).

Where images are provided to third parties, wherever practicable steps will be taken to obscure images of non-relevant individuals.

## 7. Other CCTV systems

The Schools may be provided by third parties with CCTV images and will manage these in accordance with the School's own CCTV policy and/or its Behaviour Policy.

## 8. Complaints

Any complaints in relation to the School's CCTV system or its use of CCTV should be made using the schools complaints procedure which is available on the school's website.