



# CCTV Policy

Date Adopted: December 2020

Date Reviewed: November 2022, December 2023 and December 2024

Author/owner: Board of Trustees (Operations, Audit and Risk Committee)

Review: Annual

**NB.** 'Trustees' means the Directors referred to in the Trust's Articles of Association

## History of most recent policy changes

| Version | Date          | Page         | Change  | Origin of Change e.g. TU request, Change in legislation |
|---------|---------------|--------------|---|---|
| V1.0    | December 2020 |              | New MAT Policy implemented  |   |
| V2.0    | December 2021 |              | Policy renewed with no changes  |   |
| V3.0    | November 2022 |              | Policy renewed with no changes  |   |
| V4.0    | December 2023 | Whole policy | Updated policy template to reflect new Surveillance Camera Code of Practice 2021 (replacing The CCTV Code of Practice 2008) and advice around access to CCTV footage. | New guidance  |
|         |               |              |   |   |
|         |               |              |   |   |

## **CCTV Policy**

Tarka Learning Partnership schools use closed-circuit television (CCTV) in order to protect the safety of students, staff, parents/carers and visitors.

This policy outlines how the school uses CCTV in line with the principles set out within the Surveillance Camera Code of Practice 2021. All personal data obtained is stored in accordance with UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018.

### **Purpose**

The CCTV recordings may be used for:

- prevention and detection of crimes, in the school and on the premises
- student behaviour management, discipline and exclusions
- staff disciplinary and associated processes and appeals
- maintaining a safe environment for the whole community of the school.

### **CCTV system operation**

The CCTV system will be operational 24 hours a day, 365 days a year.

The Data Controller (Tarka Learning Partnership) is registered with the Information Commissioner's Office. The Trust's registration number is Z2779200.

Schools will specify if the system does or does not record audio.

All recordings will have date and time stamps.

### **Location of cameras**

The cameras are located in places that require monitoring in order to achieve the purpose of the CCTV system.

Appropriate signs are displayed around the school's premises within prominent locations that clearly identifies that CCTV recording is in operation.

Location of signs includes at the entrance gate, building entrance and inside reception.

### **General access to CCTV footage**

It will not be common practice to release CCTV footage unless satisfactory evidence for a secure legal basis can be provided. This is authorised within Section 115, Crime and Disorder Act 1998.

In appropriate circumstances, the school may allow authorised personnel to view footage where the above [purposes](#) are considered.

The school will maintain a record of all disclosures.

All requests for access should be made in writing to the system manager Emma Gilroy and be specific to a date and time frame. Schools will specify the name of their system manager.

Any disclosure will be done in line with UK GDPR and Data Protection Act.

The school cannot guarantee disclosure of footage when made under a Subject Access Request due to:

- lack of technical resources available in order to blur or redact the footage
- the release of footage would prejudice an ongoing investigation

- other identifiable individuals have not consented.

### **Authorised CCTV system operators**

The school has limited staff members, who are fully trained and understand the importance of confidentiality, authorised to access and operate the CCTV system.

Schools will specify who the authorised personnel is within the school.

### **Storage of footage**

Footage will be retained for no longer than necessary to achieve the [purposes](#) of the system.

The retention period will usually be 60 days, but schools will specify their time frame. At the end of the retention period, the files will be overwritten by new footage.

On occasion footage may be retained for longer than the retention period. For example, where a law enforcement body is investigating a crime.

Recordings will be downloaded and encrypted, so that the data will be secure, and its integrity maintained, to ensure it can be used as evidence if required.

All recordings must be logged and traceable throughout their life within the system.

### **CCTV system security**

A full Data Privacy Impact Assessment will be completed upon deployment, replacements, development or upgrading of the CCTV system. This is in line with the UK GDPR principle, Privacy by Design, and ensures the aim of the system is reasonable, necessary and proportionate.

The system will be made secure by the following safeguards:

- the system manager will be responsible for overseeing the security of the footage and recorded images, maintenance and training of authorised personnel
- the system will usually be checked for faults each month, but schools will specify their own timeframes
- the footage will be stored securely and encrypted
- the software updates will be installed as soon as possible
- the recorded footage will be password protected
- the equipment will be located in a secured lockable enclosure accessible only to authorised personnel
- adequate cyber security measures will be in place to protect footage from cyber-attacks
- a register of authorised staff is maintained, reviewed and updated when necessary.

### **Covert recording**

The school will only 'covert record' when the following criteria are met:

- an assessment concluded that if we had to inform individuals that recording was taking place it would prejudice our objective
- there is reasonable cause to suspect specific criminal activity or actions that could result in a serious breach of staff or volunteer behaviour expectations is taking place
- covert processing is carried out for limited and reasonable period of time and related to specific suspected criminal activity

- if the situation arises where the school adopts 'covert recording', there will be a clear documented procedure which sets out how the decision to record covertly was reached, by whom and the risk of intrusion on individuals.

### **Complaints**

Any complaints should be made in writing to the system manager. Schools will specify the name and contact details for their system manager.

### **Review and monitoring**

Appropriate changes will be made by the Trust accordingly in line with changes to legislation.

The headteacher will communicate changes to all authorised staff members.

Scheduled review date is annual.