



CCTV Policy & Procedures

Date of Approval:	29th March 2023
Approved by:	ARF Committee
Review Date:	March 2025



Policy Information:

Date of last review	New policy	Review period	2 years
Date approved	March 2023	Approved by	ARF Committee
Policy owner	Director of Operations	Date of next review	March 2025

Updates made since the last review:

Review date	Changes made	By whom

Note – this Policy replaces any school level policy which existed before adoption and will be passed to schools to note via their Local Academy Council

Contents

1. Introduction	2
2. Objectives of the CCTV Scheme	2
3. Roles and Responsibilities.....	3
4. Operation of the System.....	4
5. Notification	5
6. Storage and Retention.....	5
7. Disclosure	5
8. Training	6
9. Monitoring and Review	6

Appendix 1 and 2 – CCTV access log sheet (example), at the end of the policy.

1. Introduction

The purpose of these procedures is to provide assistance in the operation, management and regulation of the CCTV systems in place at the academies within the Trust.

This document is subordinate to our Data Protection Policy and operates within the context of that policy. CCTV systems within the Trust are owned and operated as follows:

Academy	Owned By	Operated By
Brays School	No System Installed	N/A
Hallmoor School	Forward Education Trust	Hallmoor School
High Point Academy	Forward Education Trust	High Point Academy
Lea Hall Academy	Forward Education Trust	Lea Hall Academy
Leycroft Academy	No System Installed	N/A
The Bridge School	Forward Education Trust	The Bridge School



The Heights Academy	Forward Education Trust	The Heights Academy
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These procedures follow the ICO's Code of Practice for Surveillance Cameras and Personal Data, the Data Protection Act 2018, UKGDPR, the Freedom of Information Act 2000, the Equality Act 2010, the Regulation of Investigatory Power Act 2000, our Data Protection Policy, and the Trust Privacy Notices.

We have considered the privacy issues involved with using surveillance systems and have concluded that their use is necessary and proportionate to the needs we have identified.

It is not the Policy of Forward Education Trust to consider installation of CCTV in existing schools unless the risk analysis is heightened significantly. Other than at The Bridge School, where CCTV relates to door access at reception only, CCTV installations have occurred as part of a new build programme supported and/or funded by the Local Authority and/or Department for Education.

2. Objectives of the CCTV Scheme

In each academy where CCTV systems are in operation, the scheme aims to:

- protect the Trust's buildings and assets, both during and after operating hours;
- allow the academy to uphold its duties in relation to safeguarding;
- increase the personal safety of staff, pupils and visitors;
- reduce the risk of bullying;
- reduce the incidence of crime and anti-social behaviour;
- support the Police in efforts to deter and detect and investigate crime;
- assist in identifying, apprehending and prosecuting offenders;
- protect members of the public; and
- ensure other relevant policies can be operated in line with expected standards.

In line with those aims, any information captured by our CCTV systems is processed in performance of tasks carried out in the public interest. Any special category data is processed for reasons of substantial public interest.

The CCTV system is not intended for the following purposes, which are prohibited:

- covert surveillance, unless it is at the written request of a law enforcement agency with the appropriate authority;
- monitoring individuals based upon their protected characteristics as specified by the Equality Act 2010; or
- any other purpose which is not consistent with the stated aims.

3. Roles and Responsibilities

Forward Education Trust



Forward Education Trust is the data controller for all data captured by its academies' CCTV systems. The Trust is responsible for:

- proposing, amending and maintaining these CCTV procedures, in consultation with appropriate stakeholders and within the limits of our Data Protection Policy and relevant legislation;
- maintaining Privacy Notices, which will include explicit references to the CCTV systems where appropriate;
- maintaining a Retention Schedule, which will include explicit references to information recorded by the CCTV systems; and
- providing operational advice and support to the academies on the administration of these procedures, and on data protection issues more generally.

The Data Protection Officer (DPO)

The DPO, who is named within our Data Protection Policy, is responsible for:

- independently monitoring compliance with these CCTV procedures;
- coordinating any data protection impact assessments, as appropriate;
- reporting any findings and recommendations to the Trust for consideration;
- providing operational and strategic advice and support on data protection issues
- investigating any suspected data breaches relating to the CCTV system; and
- coordinating responses to subject access requests and freedom of information requests relating to information captured by the CCTV system.

Headteachers/Head Of Schools

The Headteacher, or Head of School for each academy is responsible for:

- day-to-day leadership on data protection issues within the academy;
- ensuring routine performance monitoring, including random operating checks, takes place;
- supervising access to, and administration of, the CCTV system;
- ensuring staff receive appropriate and regular training on data protection;
- delegating operational duties within the academy as appropriate; and
- appointing the System Operator (s).

The System Operators

The System Operator(s) for each academy is responsible for:

- the day-to-day administration of the CCTV system, in accordance with these procedures;
- regulating access to CCTV control areas, by satisfying themselves about the identity of the visitor(s) and the purpose of the visit(s) before any access is permitted;
- ensuring CCTV control areas are kept secure;
- maintaining logs to record who accesses the system and its recordings, and when;
- applying the retention policy to ensure information captured by the system is not stored longer than necessary.



In the event that a conflict of interest is identified, the Headteacher/Head of School will nominate an alternative person to perform these duties on a case-by-case basis. These duties will be performed in accordance with our Data Protection Policy.

4. Operation of the System

Commented [SD1]: Are you able to say that you have reviewed the location and access controls in each school, to satisfy yourself that access to viewing live CCTV images is reasonably restricted?

The CCTV systems within the Trust are implemented as follows:

Academy	Number of Cameras	Internal	External	Controlled From/By
Brays School	No System Installed	N/A	N/A	N/A
Hallmoor School	50	38	12	Site Office/Site Manager
High Point Academy	9	4	5	Headteacher Office/Headteacher and Site Manager
Lea Hall Academy	37	14	23	Admin Office Area/Site Manager
Leycroft Academy	No System Installed	N/A	N/A	N/A
The Bridge School	1	0	1	Door access control from reception
The Heights	23	7	16	Admin Office/Site Manager

These systems will be operated 24 hours per day for every day of the year.

The location of cameras is a key consideration in ensuring the CCTV scheme meets its objectives while minimising risks to individuals' privacy. Each academy will consider the following criteria when selecting locations for any additional cameras for installation:

- Spaces that do not have relevance to the scheme's purposes will be avoided where possible. This consideration should be given particular weight for spaces which are not part of the academy's premises (such as public pavements or neighbouring property).
- Cameras should be sited to ensure they can produce images of the right quality, taking into account their technical capabilities and the environment in which they are placed.
- Cameras should be suitable for the location, bearing in mind the light levels and the size of the area to be viewed by each camera.
- Cameras should be positioned so they produce images of a consistent quality throughout the year (such that they are not obscured by plant growth during spring, for example).
- Cameras should be sited so they are secure and protected from vandalism.

Unless an immediate response is required, staff must not direct cameras at an individual, their property, or a specific group of individuals without an authorisation being obtained for directed surveillance to take place, as set out in the Regulation of Investigatory Power Act



2000.

5. Notification

Each academy will notify individuals that CCTV is in use by installing and maintaining signage at entrances to the academy's premises. Signage will:

- be clearly visible in the areas where CCTV is present
- text will be printed so it is legible;
- contain details of the organisation operating the system and who to contact about the scheme (where these things are not obvious to those being monitored);
- include basic contact details such as a simple website address, telephone number or email contact; and
- be an appropriate size depending on context such as whether they will be viewed by pedestrians or motorists.

The academies will provide a copy of these procedures, and the Privacy Notices, upon request.

6. Storage and Retention

Information captured by the CCTV systems will not be kept for longer than is necessary and for a time period that is relevant to the purposes we have established. As a minimum, CCTV footage will be retained for a period of 30 calendar days.

Where clips, or footage has been saved or exported to support the management of specific incidents, or support a complaint relating to CCTV, the retention period will be directly associated for the purpose it has been identified as supporting.

Recorded material will be stored:

- in a way that maintains the integrity of the information; and
- in a secure environment with restricted access and which is locked when not occupied by authorised staff.

The Data Protection Officer, and staff at the Trust, are authorised to access the system and its recordings on a need-to-know basis. Other staff within the academies will be authorised by their Headteacher/ Head of School.

7. Disclosure

Information captured by the CCTV systems is highly likely to constitute personal data, including special category data. Decisions to disclose this information externally may only be made by the Headteacher/Head of School of the academy or the Trust in consultation with the Data Protection Officer.



Requests will be considered on a case-by-case basis but such information may be disclosed to:

- the Police in order to support the detection and prevention of crime;
- the Health and Safety Executive, Local Authority, or any other statutory body charged with safeguarding children and young people in order to promote that safeguarding;
- individuals (or their authorised representatives) in response to a subject access request for their own personal data or where the requested information is subject to a court order; or
- the Trust or academy's insurance provider, where the information is required to support a claim for damages done to the insured property.

Where information is requested by another organisation, the request should be made in writing. All requests will be logged by the System Operator. Logs must be available on request to the Trust or Data Protection Officer.

8. Training

All staff will be entitled to receive general training on data protection. System Operators will require additional training before they are permitted access to the CCTV system. That will include:

- how to implement these procedures;
- that they are subject to a confidentiality duty and that it is a criminal offence to misuse surveillance system information;
- how to apply the arrangements set out in the Retention Schedule as they relate to information captured by the CCTV system;
- how to handle information securely;
- how to recognise both a subject access request and a freedom of information request, and what to do if such a request is received; and
- what to do if they receive a request for information from an official authority, such as the Police.

9. Monitoring and Review

The Headteacher/ Head of School for each academy will arrange for routine performance monitoring, including random operating checks. Such checks will consider, for example, whether:

- access restrictions are implemented appropriately and logs are kept up-to-date;
- signage is adequate; and
- recordings are disposed of in line with the Retention Schedule.

Additionally, independent monitoring may be carried out by the Data Protection Officer and/or the Trust. Such monitoring may take the form of a routine operating check, as above, but will also focus wider questions including whether:

- the system is addressing the needs and delivering the benefits that justify its use;



- the scheme complies with relevant legislation and codes of practice; and
- the technical, physical and organisational measures used are appropriate.

10. Last Update

This policy was last updated in February 2023



Appendix 1

CCTV Footage Request Log

Name:			
Designation:			
Company name:			
Address:			
Post code:			
Contact number:			
Date of incident viewed: ____ / ____ / ____ Time of clip start: ____:____ End: ____:____			
Reason for request			
<div> <div>Viewing only <input type="checkbox"/></div> <div>Downloaded copy <input type="checkbox"/></div> </div>			
(Delete as appropriate) I hereby acknowledge receipt of CCTV footage/viewing of CCTV footage:		I hereby authorise the requested activity subject to the FET CCTV policy:	
Requested by Name: _____		Authorised by Name: _____	
Signature: _____		Designation: _____	
Date: _____		Signature: _____	
		Date: _____	
Date:		Document reference No:	

Appendix 2

CCTV viewing Log Sheet

Name of school: _____

Document log relating to this viewing	Date & time	Date & time of incident	Location/ cam No.	Reason for viewing	Name & role of viewer	Signature of viewer
	(example) 27.02.2020 1.35pm	(example) 27.02.2020 11.00am	(example) KS1 corridor Cam 3	(example) To see how a pupil fell and fractured wrist.	(example) Nicole Green DHT	(example) 