



CCTV POLICY

March 2024



Document Control

Document owner:	Chief Executive Officer
Executive responsible for review and update:	Trust Data Protection Officer
Approver:	Educational Outcomes Committee
Date approved:	13 March 2024
Date of next review:	By March 2026
Category of policy:	This Policy is a Trust Policy which means it must be followed in its entirety by all schools in The Circle Trust.
Required on website:	Yes



Document Change History

The table below contains the changes made between the different final editions of this document set for approval. This is to help provide information to those reviewing and approving the document of the changes being made.

Version	Section	Details of Change
March 2024	All	New policy format introduced
	9.4	Clarification CCTV images may be shared for disciplinary processes
	Appendix	Information for Badgemore Primary School added in anticipation of the school converting to academy status and joining the Trust



Contents

Document Control	1
Document Change History.....	2
1 Purpose of the Policy	4
2 Introduction	4
3 Description of system	4
4 Siting of Cameras	4
5 Privacy Impact Assessment	5
6 Management and Access.....	5
7 Storage and Retention of Images	5
8 Disclosure of Images to Data Subjects.....	6
9 Disclosure of Images to Third Parties	7
10 Review of Policy and CCTV System	7
11 Misuse of CCTV systems	8
12 Complaints relating to this policy	8
CCTV PRIVACY IMPACT ASSESSMENT TEMPLATE.....	9
Appendix 1.....	11



1 Purpose of the Policy

- 1.1 The Circle Trust uses Close Circuit Television (“CCTV”) within the premises of each school within the Trust. The purpose of this policy is to set out the position of the Trust as to the management, operation and use of the CCTV at the Circle Trust.
- 1.2 This policy applies to all members of our workforce, visitors to the Trust premises and all other persons whose images may be captured by the CCTV system.
- 1.3 This policy takes account of all applicable legislation and guidance, including:
 - 1.3.1 General Data Protection Regulation (“GDPR”);
 - 1.3.2 Data Protection Act 2018 (together the Data Protection Legislation);
 - 1.3.3 CCTV Code of Practice produced by the Information Commissioner;
 - 1.3.4 Human Rights Act 1998;
- 1.4 This policy sets out the position of the Trust in relation to its use of CCTV.

2 Introduction

- 2.1 The Trust uses CCTV for the following purposes:
 - 2.1.1 to provide a safe and secure environment for pupils, staff and visitors;
 - 2.1.2 to prevent the loss of or damage to the Trust buildings and/or assets;
 - 2.1.3 to assist in the prevention of crime and assist law enforcement agencies in apprehending offenders;
 - 2.1.4 to assist in managing the schools.

3 Description of system

- 3.1 Each school within the Trust must describe the system it uses, including the number of cameras, the technical capabilities of the cameras, whether these have sound recording capabilities, whether these cameras move or are fixed. These notes can be found in Appendix 1.

4 Siting of Cameras

- 4.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.



- 4.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The Trust will make all reasonable efforts to ensure that areas outside of the Trust premises are not recorded.
- 4.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.
- 4.4 Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets. Should cameras be sited in classrooms then this should be made clear to users of the classroom with signs, together with justification supported by a privacy impact assessment.

5 Privacy Impact Assessment

- 5.1 Prior to the installation of any CCTV camera or system, a privacy impact assessment will be conducted by the school to ensure that the proposed installation is compliant with legislation and ICO guidance.
- 5.2 The school will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

6 Management and Access

- 6.1 The CCTV system will be managed by the Data Lead of each school.
- 6.2 On a day-to-day basis the CCTV system will be operated by the IT Network Managers in each school.
- 6.3 The viewing of live CCTV images in each school will be restricted to;
 - 6.3.1 members of the senior leadership team (SLT) to provide a safe and secure environment for pupils, staff and visitors;
 - 6.3.2 the business manager and site manager(s) to prevent the loss of or damage to the Trust buildings and/or assets.
- 6.4 Recorded images which are stored by the CCTV system and access to these images is restricted to members of the senior leadership team and site managers.
- 6.5 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- 6.6 The CCTV system is checked monthly by the IT Network Manager to ensure that it is operating effectively.

7 Storage and Retention of Images

- 7.1 Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.



- 7.2 Recorded images are stored only for a period of 30 days unless there is a specific purpose for which they are retained for a longer period.
- 7.3 The school will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:
 - 7.3.1 CCTV recording systems being located in restricted access areas;
 - 7.3.2 the CCTV system being encrypted/password protected;
 - 7.3.3 restriction of the ability to make copies to specified members of staff.

8 Disclosure of Images to Data Subjects

- 8.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation and has a right to request access to those images.
- 8.2 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the Trust's Subject Access Request procedures. Please refer to [The Circle Trust Data Protection Policy](#).
- 8.3 When such a request is made the Data Lead at the school will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.
- 8.4 If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The Data Lead must take appropriate measures to ensure that the footage is restricted in this way.
- 8.5 If the footage contains images of other individuals then the school must consider whether:
 - 8.5.1 the request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
 - 8.5.2 the other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
 - 8.5.3 if not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
- 8.6 A record must be kept, and held securely, of all disclosures which sets out:
 - 8.6.1 when the request was made;
 - 8.6.2 the process followed by the Data Lead in determining whether the images contained third parties;
 - 8.6.3 the considerations as to whether to allow access to those images;



- 8.6.4 the individuals that were permitted to view the images and when; and
- 8.6.5 whether a copy of the images was provided, and if so to whom, when and in what format.

8.7 When a subject access request is made then, unless an exemption applies (such as in relation to third party data that it would be unreasonable to disclose) then the requester is entitled to a copy in a permanent form. The policy refers only to “access” as opposed to a “permanent copy” as the school may consider it preferable in certain circumstances to seek to allow access to images by viewing in the first instance without providing copies of images. If an individual agrees to viewing the images only then a permanent copy does not need to be provided. However if a permanent copy is requested then this should be provided unless to do so is not possible or would involve disproportionate effort.

9 Disclosure of Images to Third Parties

- 9.1 The School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.
- 9.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.
- 9.3 If a request is received from a law enforcement agency for disclosure of CCTV images then the Data Lead or members of SLT must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.
- 9.4 Where a disciplinary process is underway, CCTV images could be shared with the investigator, the disciplinary panel and any member of staff under this process.
- 9.5 The information above must be recorded in relation to any disclosure.
- 9.6 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 Trust’s Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

10 Review of Policy and CCTV System

- 10.1 This policy will be reviewed bi-annually.
- 10.2 The CCTV system and the privacy impact assessment relating to it will be reviewed bi-annually.
- 10.3 The privacy impact assessment (PIA) relating to the system should be reviewed annually to ensure that the use of any CCTV system continues to be justified and is compliant with legal requirements. The school should ensure that it has procedures in place to ensure that the CCTV system is regularly reviewed.



11 Misuse of CCTV systems

- 11.1 The misuse of a CCTV system could constitute a criminal offence.
- 11.2 Any member of staff who breaches this policy may be subject to disciplinary action.

12 Complaints relating to this policy

- 12.1 Any complaints relating to this policy or to the CCTV system operated by the school should be made in accordance with [The Circle Trust Complaints Policy](#).



CCTV PRIVACY IMPACT ASSESSMENT TEMPLATE

1. Who will be captured on CCTV?

[Pupils, staff, parents / carers, volunteers, Trustees/Advisors and other visitors including members of the public etc]

2. What personal data will be processed?

[Facial Images, behaviour, sound, etc]

3. What are the purposes for operating the CCTV system? Set out the problem that the school is seeking to address and why the CCTV is the best solution and the matter cannot be addressed by way of less intrusive means.

[Prevention or detection of crime etc]

4. What is the lawful basis for operating the CCTV system?

[Legal Obligation, legitimate interests of the organisation to maintain health and safety and to prevent and investigate crime]

5. Who is/are the named person(s) responsible for the operation of the system?

6. Describe the CCTV system, including:

a. how this has been chosen to ensure that clear images are produced so that the images can be used for the purpose for which they are obtained;

b. siting of the cameras and why such locations were chosen;

c. how cameras have been sited to avoid capturing images which are not necessary for the purposes of the CCTV system;

d. where signs notifying individuals that CCTV is in operation are located and why those locations were chosen; and

e. whether the system enables third party data to be redacted, for example via blurring of details of third party individuals.

7. Set out the details of any sharing with third parties, including processors

[Police, subject access, etc. Careful consideration should be given to whether any provider is used in relation to the CCTV system and the access they might have to images. Will those processors send this data outside of the EEA, for example for storage in a cloud based system?]

8. Set out the retention period of any recordings, including why those periods have been chosen



9. Set out the security measures in place to ensure that recordings are captured and stored securely

10. What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?

For example:

- Is it fair to record them in the way proposed?
- How is the amount of data processed to be minimised?
- What are the risks of the system being accessed unlawfully?
- What are the potential data breach risks?
- What are the risks during any transfer of recordings, or when disclosed to third parties such as the police?

11. What measures are in place to address the risks identified?

12. Have parents and pupils where appropriate been consulted as to the use of the CCTV system? If so, what views were expressed and how have these been accounted for?

13. When will this privacy impact assessment be reviewed?

Approval:

This assessment was approved by the Data Protection Officer:

DPO Name	<input type="text"/>
DPO Signature	<input type="text"/>
Date	<input type="text"/>



Appendix 1

Set out below is a description for each school in the Trust of the CCTV system, including the number of cameras, the technical capabilities of the cameras, whether these have sound recording capabilities, whether these cameras move or are fixed.

St Crispin's School

- 85 Hikvision Hi-Definition IP CCTV cameras with built in infra reds, across the school site
- 1 PTZ car park camera.
- Connected to 2 32 channel HD CCTV recorders in the IT office.

The Emmbrook School

Main School:

- 15 External Geovision cameras 2-4 megapixels each
- 1 Hikvision PTZ Moving camera (external)
- 10 internal Geovision cameras 2-4 megapixels
- 5 external Hikvision cameras 4-6 megapixels
- 15 internal Hikvision cameras 4-6 megapixels

Humanities Block:

- 3 internal geovision cameras 2-4 megapixels
- 13 internal Hikvision cameras 4-6 megapixels
- Server room 3x EZVision CCTV servers running Geovision GV-NVR software

Science Block:

- 2 internal Geovision cameras 2-4 megapixels
- 4 internal Hikvision cameras 4-6 megapixels

English Block:

- 15 internal Hikvision cameras 4-6 megapixels

Maths Block:

- 11 internal Hikvision cameras 4-6 megapixels

PE Block:

- 1 internal Hikvision camera

All have sound recording capabilities disabled if they have it at all and all have infrared capabilities.



Nine Mile Ride School

Reception – Eneo NVR with 2 cameras. 2-4 megapixel cameras. Both cameras are fixed.

Shinfield Infant and Nursery School

Front of school – Three Dahua 4MP turret camera (IPC-HDW4431EM-AS-0280). – fixed position

School Hall – Two Dahua 4MP active deterrent camera (IPC-HDW5541H-AS-PV) – fixed position

Nursery – One Dahua 4MP turret camera (IPC-HDW4431EM-AS-0280) – fixed position

There is no sound recording capability.

Westende Junior School

No CCTV on site

Wescott Infant School

No CCTV on site

Emmbrook Infant School

No CCTV on site

Emmbrook Junior School

No CCTV on site

Badgemore Primary School

Colour Bullet Camera waterproof SPRO

Model - SPQ20/2812R/40M-4

System: PAL

Lens 2.8 - 12mm

Power: DC12V/ 380mA

Camera 1(left overlooking pedestrian gate) - Serial Number CARA024919

Camera 2 (right overlooking vehicle gate) - Serial Number CARA024874

The cameras are fixed and have no audio recording capability.