CCTV Policy

September 2024

Date Approved by The Board of Trustees	**26th September 2024**
Effective period	**1/09/24 - 30/08/25**
Reviewer	**Jo Brace**
Date of Review	**September 24**
Next Review Due	**July 25**

Contents

1. Introduction

1.1 The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system of any of the premises within Herefordshire Marches Federation of Academies (HMFA) Trust.

1.2 The system comprises a number of fixed cameras located around the school sites. All CCTV recorders are password protected and monitoring is only available to authorised staff.

1.3 This Policy follows Data Protection guidelines, including guidance from the Information Commissioner's Office and the Surveillance Camera Commissioner.

1.4 The CCTV system is owned by the school/Trust.

1.5 Authorised Staff

- Headteacher
- DSL (Designated Safeguarding Lead)
- Director of IT
- Office administration assistant
- Site Manager

2. Purposes and Justification

2.1 The purpose of the CCTV scheme:

a) To protect the school buildings and their assets
b) To increase personal safety and reduce the fear of crime

c) To support the Police in a bid to deter and detect crime
d) To assist in identifying, apprehending and prosecuting offender
e) To assist with the safeguarding and supervision of pupils

2.2 The HMFA Trust/school has identified the following legal bases for processing CCTV footage whichwill include personal data; UK GDPR Article 6(1)e (public task) and Article 9(2)(g) (substantial public interest) and Data Protection Act 2018 Schedule 1, paragraph 10 (preventing or detecting unlawful acts) and paragraph 36 processing criminal category data for purposes of substantial public interest.

3. Statement of intent

3.1 The HMFA Trust/School will seek to comply with the requirements both of the Data Protection Act and the Surveillance Camera Commissioner's Code of Practice.

3.2 The HMFA Trust/School will treat the system and all information, documents and recordings obtained and used as personal data which are protected by the Act.

3.3 Cameras will be used to monitor activities within the school to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of members of the school community and members ofthe public.

3.4 Materials or knowledge obtained as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Recordings will never be released to the media for purposes of entertainment.

3.5 The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

3.6 Cameras will not record any private premises.

3.7 Signs that inform people of the existence of CCTV, as required by the Code of Practice of the Information Commissioner have been placed at access routes to areas covered by the school CCTV (See Appendix 4 for example).

3.8 A log is kept of authorised staff access to School CCTV Recorded Image Access Log (Appendix 2). This is to be stored in HMFA admin – School admin area on Sharepoint.

4. Operation of and Access to the system

4.1 The Scheme is administered and managed by Sentinel (the CCTV Scheme supplier) alongside the IT Director, in accordance with the principles and objectives expressed in this policy.

4.2 Images can be accessed within the schools and is limited by physical (locked office) and technical (password protection).

4.3 Live feeds are available in the main reception from the CCTV recorder control console. Livefeeds are available to authorised staff for the management of the school, security of the site and safety of staff and pupils.

4.4 The CCTV system will be operated 24 hours each day, every day of the year.

4.5 CCTV recordings will be available for a maximum of 28 days, after this time any recordings will be automatically overwritten. Where CCTV footage is required as evidence of security (break-ins) or incidents, evidence will be copied to encrypted removable media (USB sticks etc). This footage will be stored in a secure area and only accessed by authorised personnel. This will be retained for longer periods which will be documented and justified in the Access Log. In this case, the evidence data is held in line with retention schedules e.g. accident would be for date +3yrs.

5. Printed and Recording Media Procedures

5.1 In the event of an incident requiring footage from the system to be retrieved and stored the following procedure should be followed: -

- The details of the incident should be passed to the Headteacher, who will authorise the use of the system by an authorised user.
- The relevant footage will be identified.
- An entry will be made on the Appendix 2 – School CCTV Recorded Image Access Log spreadsheet page 9.
- If the footage is required for investigation, then the User will produce a copy and save it to an encrypted USB stick. The Date and Time of the recorded extract will be registered and stored in a secure place.
- The footage may only be viewed by authorised staff.
- A record of all viewings shall be made, which if required as evidence, may be released to the Police.
- Applications received from outside bodies or Subject Access Requests to view or release records will require authorisation by the Headteacher. A fee of £10 will be charged per request or as otherwise agreed with the Headteacher.
- The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

6. Assessment of the System

6.1 A named individual responsible for the system or a delegated person will check and confirm the screen and cameras are working weekly. They will contact Sentinel for support if there is an issue.

6.2 Regular reviews of the system's operation will take place and any necessary changes in procedure and camera sighting/position will be implemented.

6.3 The IT Director and DPO will carry out an annual review of the use of CCTV, using the Appendix 1 – HMFA CCTV AnnualReview Form page 7.

6.4 The school will carry out a Data Protection Impact Assessment (DPIA) to review the use of CCTV whenever there is any significant change to the use of the system or the purpose for which is it used.

6.4 If out of hours emergency maintenance arises, the Headteacher, Site Manager or Office Assistant must be satisfied of the identity and purpose of contractors before allowingentry.

7. Breaches of the policy (including breaches of security)

7.1 Any breach of this Policy by school staff will be initially investigated by the Headteacher in order to take the appropriate disciplinary action.

7.2 Any serious breach of this Policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

8. Complaints

8.1 Any complaints about the school's CCTV system should be addressed to the Headteacher.

8.2 Complaints will be investigated in accordance with the HMFA Complaints Policy.

9. Access by the Data Subject

9.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data"relate) with a right to access copies of data held about themselves, including those obtained by CCTV.

9.2 All requests should be made in writing to the Headteacher. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

10. Monitoring and Review

10.1 This policy will be monitored and reviewed every two years by the IT Director.

10.2 The IT Director will be responsible for monitoring any changes to legislation that may affect this policy, and make the appropriate changes accordingly.

10.3 The IT Director will communicate changes to this policy to all members of staff.

Appendix 1: HMFA CCTV System Annual Review Form

HMFA CCTV SYSTEM ANNUAL REVIEW			
School:		**Date:**	
Reviewed by:		**Signed:**	

Review Statement	Satisfactory		Problems Identified?	Corrective Action Required *(if relevant)*
	Yes	No		
The school is registered with the Information Commissioner's Office and the next renewal date				
There is a named individual who is responsible for operation of the system.				
The problem we are trying to address has been clearlydefined and installing cameras is the best solution.				
The CCTV system is addressing the needs and delivering the benefits that justified its use.				
The system equipment produces clear images which the police can use to investigate crime, and these can easily betaken from the system when required.				
Cameras have been sited so that they provide clear images.				
Cameras have been positioned to avoid capturingimages of people who are not visiting the premises.				
There is sufficient suitable signage notifying people that CCTV monitoring is in operation, including our contact details where it might not be obvious that the system is managed by this				
Information is available to help deal with queries about operation of the system and how individuals can makeaccess requests.				

Sufficient safeguards are in place to protect wirelesstransmission systems from interception.				
There are sufficient controls and safeguards in place if the system is connected to acomputer, or tablet e.g. via an intranet or remotely.				

Review Statement	**Satisfactory**		**Problems Identified?**	**Corrective Action Required *(if relevant)***
	Yes	**No**		
Images from this CCTV system are securely stored, where onlya limited number of authorised persons may have access to				
Recorded data will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.				
The process for deleting data is effective and being adhered to.				
Except under the direction of an appropriate public authority(usually police), images will not be provided to third parties, unless the Headteacher has approved the disclosure of the data under the advice of the DPO.				
When information is disclosed, it is transmitted as securely as possible e.g. viewed on school premises, hand delivered/collected in person on a device, a fully tracked				
Staff are trained in security procedures and there are sanctions in place for any misuse of surveillance system				
Regular checks are carried out to ensure that the system is working properly and produces high quality and useful data.				
There is a system in place to ensure that the CCTV system and equipment updates, especially of security software are regularly downloaded, installed and checked as properly functioning.				

Appendix 2: School CCTV Recorded Image Access Log

Date	Description of Recording	Date of Recording	Start Timestamp	End Timestamp	Requester	Purpose	Retained? Y/N	Deletion Date	Deleted? Y/N	Shared Externally? Y/N	Recipient of Footage	Data Decision Recorded? Y/N

(Blank spreadsheet in HMFA Common- Policies folder, to be saved and maintained to School Admin Common area)

Appendix 3: CCTV Operator Agreement

CCTV Operator Agreement

Staff authorised to view the recordings are set out in the CCTV Policy.

I confirm I have read and understood the CCTV Policy and agree to adhere by the rules of the policy as an operator of this system.

I will update the CCTV Recorded Image Access Log every time I access the system to review a recording.

I will:

- record the reason for viewing any images
- detail any retained images, why these were retained and diarise to review savedimages for deletion
- I will ensure any retained images are password protected.
- I understand images including retained images must not be shared with third parties including staff who are not part of the senior leadership team.
- any shared images must have approval for sharing from the Headteacher.

Name of authorised operator:

Signature:

Date:

I confirm that is an authorised operator of the CCTV system.

[Headteacher:

Date:

Appendix 4: CCTV Notice

Example

HMFA HEREFORDSHIRE MARCHES FEDERATION OF ACADEMIES

IMAGES ARE BEING MONITORED FOR THE PURPOSES OF CRIME PREVENTION, PUBLIC SAFETY AND SAFEGUARDING

THE DATA CONTROLLER FOR THIS CCTV SYSTEM IS:

SCHOOL NAME

EMAIL ADDRESS **PHONE NUMBER**

Appendix 5: CCTV : School specific information

SCHOOL NAME	CCTV	No of Cameras	Named individual responsible for system (checking it works & completing log)	Named roles with authorityto view images on CCTV [1]	Record function	Storage location	Image retention period	Service and MaintenanceContractor
Kings Caple Primary Academy	Yes	2	C Phipps	Headteacher DSL Director of IT Site Manager Office Assistant	Continuous	School office – on device	28 days	Sentinel
Lord Scudamore Academy	**Yes**	8	C Hughes	Headteacher DSL Director of IT Site Manager Office Assistant	Continuous	School office – on device	28 days	Sentinel
St Weonards Academy	**Yes**	2	A Williams	Headteacher DSL Director of IT Site Manager Office Assistant	Continuous	School office – on device	28 days max	Sentinel
Sutton Primary Academy	Yes	2	L Board A Dallimore	Headteacher DSL Director of IT Site Manager Office Assistant	Continuous	School office – on device	28 days	Sentinel

[1] **or authorise others to view for identification.**