

BEECHWOOD JUNIOR SCHOOL

CCTV Policy

2025 – 2027

CCTV Policy

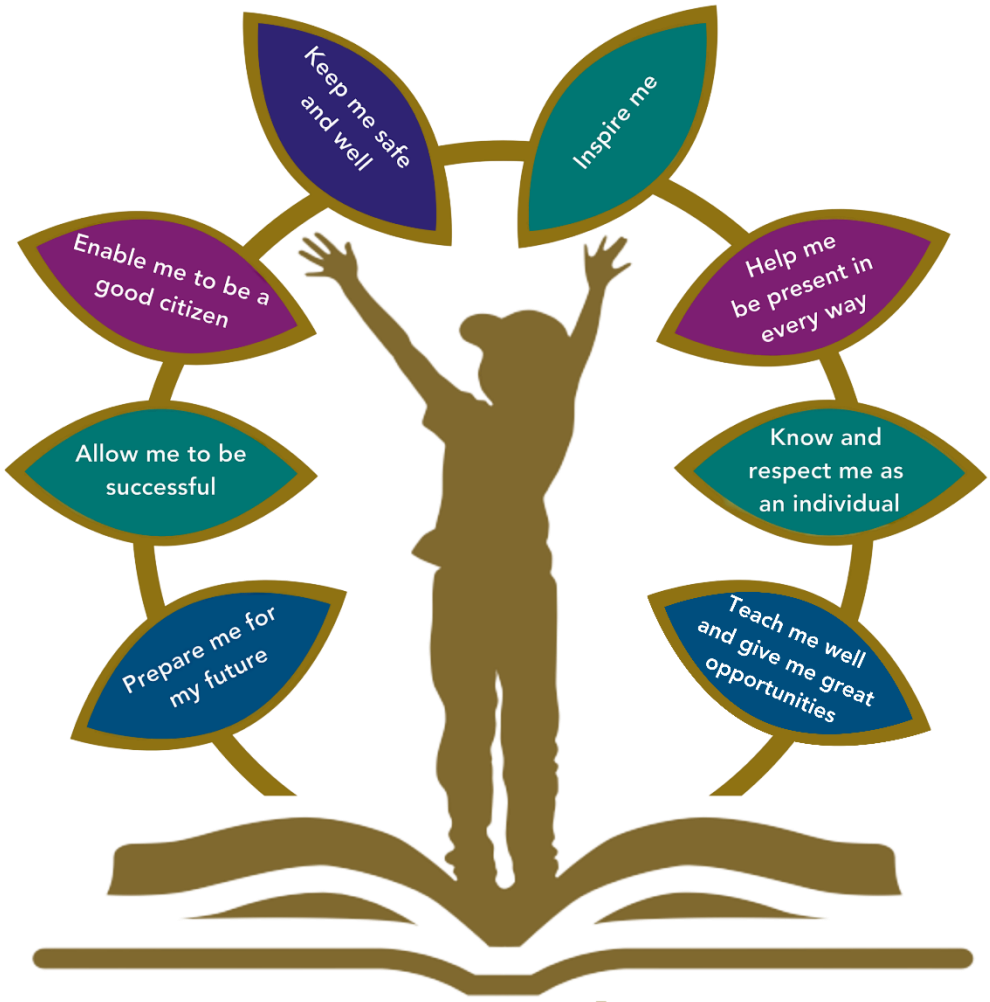
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Owner	J Solanki / J Prince	Approved by	

History of Policy Changes

Date	Page	Change	Origin of Change
Oct 25	All	References to Governing Body changed to Local Governing Committee (LGC).	Annual Review (including adoption of some elements of Browne Jacobson template)
	All	References to Headteacher changed to School Leader.	
	All	References to Clerk changed to Governance Professional.	
	3	Section entitled, Purposes and Objectives of the CCTV Scheme renamed to, Reasons for the use of CCTV	
	4	Addition of new section, Definitions	
	4	Section entitled, CCTV System Operation renamed to, How we will operate CCTV	
	5	Addition of new section, Monitoring	
	6	Addition of new section, Requests for Disclosure	
	6	Addition of new section, Data Protection Rights	
	6	Complaints section has been updated to follow the Browne Jacobson template	

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1. **Introduction**
   a. This policy is intended to clearly set out the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018) which are relevant to the school's use of CCTV and video surveillance.
   b. This policy applies to all of our workforce including employees, trustees, governors, consultants, self-employed contractors, casual workers, agency workers and volunteers. It also applies to anyone visiting our premises.
   c. A breach of this policy may, in appropriate circumstances, be treated as a disciplinary matter. Following investigation, a breach of this policy may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

2. **Reasons for the use of CCTV**
   We currently use CCTV around our premises as set out below. The use of CCTV is necessary for legitimate purposes including:

a. to prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime.
b. for the personal safety of staff, pupils, visitors and other members of the public and to act as a deterrent against crime.
c. to support law enforcement bodies in the prevention, detection and prosecution of crime.
d. to assist in day-to-day management of the school, including ensuring the health and safety of staff, pupils and others.
e. to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
f. to assist in the effective resolution of complaints which arise.
g. to monitor and minimize unauthorized and inappropriate vehicle access.
h. to assist in identifying, apprehending and prosecuting offenders.
i. to protect members of the public and private property.

This list is not exhaustive, and other purposes may be or become relevant.

3. Definitions

For the purposes of this policy, the following terms have the following meanings:

1.1 **CCTV** means fixed and domed cameras designed to capture and record images of individuals and property.

1.2 **Data processor** means any person or organisation that is not part of our workforce that processes personal data on our behalf and on our instructions.

1.3 **Personal data** means data relating to a living individual who can be identified from that data (or other data in our possession). This will include video images of identifiable individuals.

1.4 **Process, processing or processed** means any operation performed on personal data. This includes collecting, recording, organising, storing, adapting, altering, retrieving, consulting, using, disclosing, disseminating or otherwise making available or destroying personal data.

1.5 **Surveillance systems** mean any devices or systems designed to monitor or record images of individuals or information relating to individuals. The term includes CCTV systems as well as any video surveillance technology that may be introduced in the future that capture information of identifiable individuals or information relating to identifiable individuals.

- **Workforce** means any individual employed by [Trust/Academy/School] such as staff and those who volunteer in any capacity including Governors [and/or Trustees/Members/parent helpers].

4. Statement of Intent

The planning and design endeavours 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.

5. How we will operate CCTV

- Where CCTV cameras are placed on our premises, we will ensure that signs are displayed at the entrance of the surveillance area to alert individuals that their image may be recorded. The signs will contain details of the organisation operating the system, the purpose for using the surveillance system and who to contact for further information, where these things are not obvious to those being monitored.
- We will ensure that live feeds from cameras and recorded images are only viewed by approved members of staff whose role requires them to have access to such data. This may include HR staff involved with disciplinary or grievance matters.

- Recorded images will only be viewed in designated, secure offices; those with authorised access must be aware of who is around them when viewing images.
- The School Leader is responsible for the operation of the CCTV system and for ensuring compliance with this policy.

6. Monitoring

- The CCTV system will be operated 24 hours each day, every day of the year.
- Camera locations are chosen to minimise viewing spaces not relevant to the legitimate purposes of the monitoring. As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property.
- Access to the CCTV system and recorded data will be strictly limited to authorised members of staff.
- Access to the system will be approved by the School Leader, in a clear written communication to the member of staff being granted access, stating the reason for the access and under what circumstances the member of staff is authorised to use the system.
- Users should:
  - Be provided with a unique password
  - Be shown how to use the system
  - Read and confirm in writing that they have understood the CCTV policy
- Breaches of the policy by staff using and/or monitoring the system for non-work related matters, i.e. for their own recreation or interest may constitute matters of discipline under the relevant conditions of their employment.
- The system will be checked by the IT MANAGER and/or BUSINESS MANAGER on a weekly basis to ensure that it is running effectively and that the system is recording properly and the cameras are operating.

7. Location of CCTV cameras

- The cameras are sited so that they only capture images relevant to the purposes for which they are installed, and care is taken to ensure that reasonable privacy expectations are not violated. The school will ensure that the location of equipment is carefully considered to ensure that the images captured comply with the legislation.
- The school makes every effort to position cameras so that their coverage is restricted to the school premises, which may include both indoor and outdoor areas.
- CCTV will not be used in standard classrooms, however, it may be positioned in areas of high value such as ICT suites, as well as in areas of higher risk for student and staff protection or areas within the school that have been identified as not being easily monitored.
- The school will keep an updated location map of the CCTV cameras.
- Staff will have access to details of where CCTV cameras are situated, except for cameras placed for the purpose of covert monitoring.

8. Storage and Retention

- In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security.
- Recorded data will not be retained for longer than 30 days except where the image identifies an issue and is retained specifically in the context of an investigation of that issue.

- If storage is online, we will ensure that the storage locations are within the UK and is encrypted. The data will be erased permanently and securely once there is no reason to retain the recorded information. Any physical matter (e.g. tapes or discs) will be disposed of as confidential waste. Any still photographs and hard copy prints will be disposed of as confidential waste.
- Any specific incident data however may be taken off the platform and stored separately for evidence purposes for that specific incident. Data will be held until the outcome of that incident has been reached, after which it may be held for future evidence or deleted, depending on the nature and outcome of the incident.
- At the end of their useful life, all images stored in whatever format will be erased permanently and securely. Any physical matter such as tapes or discs will be disposed of as confidential waste. Any still photographs and hard copy prints will be disposed of as confidential waste.
- We may engage data processors to process data on our behalf. We will ensure reasonable contractual safeguards are in place to protect the security and integrity of the data.

9. Requests for disclosure

- No images from our CCTV cameras will be disclosed to any third party, without express permission being given by the school Data Compliance Officer or the HET Data Protection Officer.
- Data will not normally be released unless satisfactory evidence that it is required for legal proceedings or under a court order has been produced.
- In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.
- We will maintain a record of all disclosures of CCTV footage.
- No images from CCTV will ever be posted online or disclosed to the media.

10. Subject Access Requests

- Individuals may make a request for disclosure of their personal data, and this may include CCTV images (data subject access request).
- A data subject access request for any CCTV footage should be directed to the Data Compliance Officer in each school or the HET Data Protection Officer.
- In order for us to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.
- We reserve the right to obscure images of third parties when disclosing CCTV data as part of a data subject access request, where we consider it necessary to do so. Where the circumstances of an incident mean that it is not possible to effectively obscure images of third parties, we reserve the right to refuse the request on the basis that it would reveal the identities of third parties.

11. Data Protection rights

- The school has considered the Information Commissioner's Office (ICO) CCTV code of practice www.ico.org.uk to ensure CCTV is used responsibly and safeguards both trust and confidence in its use.
- The school will treat the system and all information, documents and recordings obtained and used as data.

- We recognise that, in rare circumstances, individuals may have a legal right to request erasure of personal data concerning them or to restrict the processing of their personal data.
- Any individual who considers that these rights apply to them in relation to our use of CCTV should speak to the school Data Compliance Officer in the first instance.

12. Complaints/Concerns

- If any individual has any concerns about our use of CCTV, they should speak to the School Leader in the first instance.
- Where this is not appropriate, or matters cannot be resolved informally, our workforce should use our formal grievance procedure.
- Any other individuals should make a complaint in accordance with the HET Complaints Policy and Procedure.

13. Link to other HET policies

- Complaints Policy and Procedure
- Data Protection Policy and Procedure
- Employee Code of Conduct
- Freedom of Information Policy
- School Behaviour Policy