



# **CCTV Policy**

## **September 2022**

## **Introduction**

Pele Trust and its schools take its responsibility towards the safety of staff and pupils very seriously. To that end, we may use Closed Circuit Television (CCTV) cameras to monitor the members of our school in a very specific way.

The law states that we can use a CCTV system to monitor our premises, providing our system complies with the GDPR.

The purpose of this policy is to manage and regulate the use of the CCTV system and ensure that:

- We comply with the GDPR
- The images that are captured are useable for the purposes we require them for
- Assurance is provided for those persons whose images are being captured

This policy covers the use of CCTV in the school, pertains to moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes:

- Seeing what an individual is doing
- Taking action relating to a crime
- Taking action relating to behaviour which are contrary to school policies or expected standards
- Using images of an individual in some way that could affect their privacy

This policy should be read with reference to the GDPR, the Protection of Freedoms Act 2012 and the CCTV code of practice from the Information Commissioner's Office (ICO).

This policy should also be read in conjunction with the school's Data Protection Policy and the Trust Privacy Notices.

## **Objectives**

The CCTV system will be used to:

- Maintain a safe environment
- Ensure the welfare of pupils and staff
- Ensure good order and behaviour
- Assist staff in identifying pupils who do not demonstrate good order and behaviour
- Deter criminal acts against persons and property
- Assist the police in identifying persons who have committed a criminal offence

The CCTV system will not be used for covert monitoring.

## **Protocols**

The CCTV system has been registered with the Information Commissioner's Office (ICO).

The system will comply with all additional legislation including:

- The Commissioner's Code of Practice for CCTV
- The Surveillance Camera Code of Practice 2013, published by the Home Office

The CCTV system is a closed digital system which does not make audio recordings

Warning signs have been placed throughout the premises where the CCTV system is active, as mandated by the Code of Practice of the Information Commissioner.

The CCTV system will not be trained on individuals unless an immediate response to an incident is required.

The school's CCTV system is used solely for purposes(s) identified above and is not used to routinely monitor staff conduct.

The CCTV system will not be trained on private vehicles or property outside the perimeter of the school.

Recordings will only be released outside of school following written authority from the Police, or in respect of a subject access request.

## **Coverage**

The CCTV system has been designed for maximum effectiveness and efficiency. The school cannot guarantee that every area will be covered and incident detected as 'blind spots' do exist.

Cameras are located in those areas where the school has identified a need and where other solutions are ineffective. These are usually within corridors and external areas.

## **Administration**

Pele Trust is the Data Controller however day to day responsibility for CCTV is delegated to the Headteacher and School Business Manager.

Access to the CCTV system, software and data will usually be limited to key members of school staff including the Headteacher, Senior Leadership Team and key pastoral staff members and the IT Manager.

The main control facility is kept secure and locked when not in use.

The Data Controller and members of the school Senior Leadership team have responsibility for authorising access to images for any other member of staff and this will only be granted to staff members who require access in order to achieve the purpose of using the equipment.

The system is owned by the school and images from the system are strictly controlled and monitored by authorised personnel.

## **Privacy, Disclosure and Retention**

Images, both still and moving, may be released to the police for the detection of crime under section 29 of the Data Protection Act 1998.

Applications received from outside bodies, e.g. solicitors, to view or release images will be referred to the Headteacher.

Under the Schools (Specification and Disposal of Articles) Regulations 2012 school staff can view CCTV footage in order to make a decision as to whether to search a pupil for an item. If the recorded footage reveals that theft has been committed by a member of staff, this evidence may be used in a disciplinary case.

Images will only be retained for as long as they are required.

## **Access**

Requests for access will be handled in accordance with our Data Protection and Subject Access Request policies.

All disks containing images belong to and remain the property of Pele Trust.

Requests by persons outside the school for viewing or copying disks, or obtaining digital recordings, will be assessed by the Headteacher on a case-by-case basis with close regard to Data Protection and Freedom of Information legislation and in accordance with this policy.

The Headteacher will normally release images provided satisfactory documentary evidence is produced to show that they are required for legal proceedings, a subject access request, or in response to a Court Order.

Releasing the recorded images to third parties will be made only in the following limited and prescribed circumstances and to the extent required or permitted by law:

**The police** – where the images recorded would assist in a specific criminal inquiry.

**Prosecution agencies** – such as the Crown Prosecution Service (CPS).

**Relevant legal representatives** – such as lawyers and barristers.

Persons who have been recorded and whose images have been retained where disclosure is required by virtue of the Data Protection Act 1998 and the Freedom of Information Act.

Requests for access or disclosure will be recorded and the Headteacher will make the final decision as to whether recorded images may be released to persons other than the police, having due regard to the privacy and rights of other persons captured on the CCTV.

### **Concerns**

Concerns should be raised to the school in the first instance or to the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

### **Contact**

Please contact the School Business Manager if you have any queries about this policy.