



ANGLIAN LEARNING

*Dynamic, empowered learners who thrive and lead in
their communities: locally, nationally and globally*

CCTV POLICY

THIS POLICY WAS APPROVED:	SUMMER 2024
POLICY VERSION:	3.0
THIS POLICY WILL BE REVIEWED:	SUMMER 2027
MEMBER OF STAFF WITH RESPONSIBILITY FOR REVIEW:	HEAD OF GOVERNANCE, COMPLIANCE AND RISK
THIS POLICY WAS CONSULTED WITH:	CLT, DPO
THIS POLICY WAS DISTRIBUTED TO:	DPLs, CONNECT

1. CCTV Systems Overview

- 1.1. The CCTV systems are owned by the Trust and managed by the Trust and its appointed agents, which include any management or maintenance companies that may be appointed. Under the Data Protection Act 2018 and GDPR, the Trust is the 'data controller' for the images produced by the CCTV system.
- 1.2. The Central Leadership Team is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.
- 1.3. The CCTV systems operate across all of the sites. Details of the number of cameras and their location can be obtained by contacting the technical services team.
- 1.4. Signs are placed at relevant points to inform people that CCTV cameras are operational in that area.
- 1.5. The Headteacher/Principal is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice in collaboration with operations and technical services.
- 1.6. CCTV cameras are not installed in areas in which individuals would have an expectation of privacy such as toilets, changing facilities, etc.
- 1.7. Cameras are sited to ensure that they cover Trust premises as far as is possible. Cameras are installed throughout the Trust's sites within buildings and externally in vulnerable public facing areas.
- 1.8. Cameras are primarily sited to focus on communal areas of the school sites but may also be used in rooms for the protection of people and assets, where considered necessary by the Headteacher/Principal and subject to a Data Protection Impact Assessment being conducted. In such cases clear signage will be displayed as per 1.4, 1.5.
- 1.9. Where cameras are within sight of private areas, such as residential, the use of 'privacy masks' is implemented, such that privacy in these physical areas can be maintained. Therefore no footage is captured in these areas.
- 1.10. The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.
- 1.11. Any proposed new CCTV installation is subject to a Data Protection Impact Assessment.

2. Purposes of the CCTV Systems

- 2.1. The main purposes are:

- To protect pupils, employees and visitors against harm to their person and/or property;
 - To increase a sense of personal safety and reduce the fear of crime;
 - To protect the school buildings and assets;
 - To support the police in preventing and detecting crime;
 - To assist in identifying, apprehending and prosecuting offenders;
 - To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence
- 2.2. Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose or for purposes of entertainment.

3. Monitoring and Recording

- 3.1. Cameras are monitored by the Site Team, Behaviour Team and selected, authorised members of the Senior Leadership Teams. No other member of staff will have access without the approval of the headteacher and this will only be given in exceptional circumstances in accordance with the stated aims of the CCTV system. Where specific operations are in place, such as Sports Centres, access to relevant camera feeds to these personnel is provided. The system is supported by the Director of Operations and Technical Services Team.
- 3.2. All personnel who have been granted access to the system are required to confirm that they have read and understand this policy via this link <https://forms.office.com/e/kPTn6R5Jz8>
- 3.3. Images are recorded centrally on servers located securely within the Trust's network and are viewable by the CCTV users listed in 3.1.
- 3.4. The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed and the cameras are checked regularly to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.
- 3.5. All images recorded by the CCTV System remain the property and copyright of the Trust.
- 3.6. The monitoring of staff activities will be carried out in accordance with Part 3 of the Employment Practices Code (ICO).
- 3.7. The use of covert cameras will be restricted to very rare occasions, when a series of suspected criminal acts have taken place within a particular area that is not otherwise fitted with CCTV. A request for the use of covert cameras will clearly state the purpose and reasons for use and the authority of the Chief Executive Officer will be sought before the installation of any covert cameras. The CEO should be satisfied that all other physical methods of prevention have been exhausted prior to the use of covert recording. CCTV will not be deployed to areas that

compromise the safeguarding of children or adults e.g. the inside of toilet facilities, changing areas.

- 3.8. Such CCTV should not be monitored remotely (off site) unless for a specific, time limited purpose strictly in accordance with the stated aims.
- 3.9. CCTV shall not be used for the routine surveillance of staff unless with the express approval of both the CEO and Director of People and only to prevent criminal behaviour and/or actions that may compromise the safeguarding of children.
- 3.10. All such monitoring will be fully documented using the logging form <https://forms.office.com/e/6CYhUUXLEs> and will only take place for a limited and reasonable period.

4. Disclosure of Images

- 4.1. A record of any disclosure made under this policy will be held centrally. Authorised personnel should complete the Microsoft form which can be found on Connect (<https://forms.office.com/e/kDGjnKnySk>), itemising the date, time, camera, requestor, authoriser and reason for the disclosure.
- 4.2. A request for images made by a third party should be made in writing to the Headteacher/Principal. The Police may request images verbally as part of an investigation, but the request must be logged by the academy.
- 4.3. In limited circumstances, it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.
- 4.4. Such disclosures will be made at the direction of the Headteacher/Principal of the academy in question or Director of ICT, with reference to relevant legislation and where necessary, following advice from the DPO. Disclosures will be transmitted securely to the recipients and documented accordingly.
- 4.5. Where an allegation has been raised against a member of staff and at the formal request of the Investigating Officer or HR Manager/Advisor, the Director of ICT may provide access to CCTV images as part of the investigation after consultation with the Director of People. CCTV footage may be used in investigations and disciplinary proceedings where appropriate.
- 4.6. The Director of ICT may provide access to CCTV images to Investigating Officers when sought as evidence in relation to allegations of pupil behaviour.

5. Retention of Images

- 5.1. Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV will be retained for no longer than 30 days

from the date of recording. Images will be automatically overwritten after this point.

- 5.2. Where an image is required to be held in excess of the retention period referred to in 5.1, the Headteacher/Principal or their nominated deputy, will be responsible for authorising such a request and documenting this accordingly.
- 5.3. Images held in excess of their retention period will be stored in a central Microsoft Team, reviewed on a three-monthly basis and any not required for evidential purposes will be deleted.
- 5.4. Access to retained CCTV images is restricted to the Director of ICT and/or Headteacher/Principal of the academy and other persons as required and as authorised by the Director of ICT or Headteacher /Principal.

6. Audio Recordings

- 6.1. The Trust may use cameras to record audio as well as images in certain locations where staff and students may feel particularly vulnerable. Such recordings will only be accessed should there be an incident where verbal abuse etc has been alleged. Recordings will not be accessed for the purpose of listening to normal everyday conversations.
- 6.2. Written permission by the Headteacher/Principal of the school is required prior to any member of staff accessing the audio recordings.

