



**CORLEY ACADEMY**  
Inclusion Aspiration Perseverance Independence

# CCTV Policy

**23<sup>rd</sup> March 2023**

The vast majority of students attending Corley Academy have a diagnosis of Autism. This must be taken into account when reviewing and implementing all policy procedures.

Version: **March 2023**

Ratified by the (Local Governing Body)

Signed by the (LGB): M Lea

**Date: 02.05.2023**

To be reviewed (\*annually/every 2 years): **Date: 23/03/2025**

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## 1. Aims

This policy aims to set out the school's approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on school property.

### 1.1. Statement of Intent

The purpose of the CCTV system is to:-

- Make members of the school community feel safe
- Protect members of the school community from harm to themselves or to their property
- Deter criminality in the school
- Protect school assets and buildings
- Assist police to deter and detect crime
- Determine the cause of accidents
- Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings
- To assist in the defense of any litigation proceedings

The CCTV system will not be used to:

- Encroach on an individual's right to privacy
- Monitor people in spaces where they have a heightened expectation of privacy (including toilets and changing rooms)
- Follow particular individuals, unless there is an ongoing emergency incident occurring
- Pursue any other purposes than the ones stated above

The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

The CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The system complies with the requirements of the Data Protection Act 2018 and UK GDPR. Footage or any information gleaned through the CCTV system will never be used for commercial purposes.

In the unlikely event that the police request that CCTV footage be released to the media, the request will only be complied with when written authority has been provided by the police, and only to assist in the investigation of a specific crime.

The footage generated by the system should be of good enough quality to be of use to the police or the court in identifying suspects.

## **2. Relevant legislation and guidance**

### **2.1. Legislation**

- [UK General Data Protection Regulation](#)
- [Data Protection Act 2018](#)
- [Human Rights Act 1998](#)
- [European Convention on Human Rights](#)
- [The Regulation of Investigatory Powers Act 2000](#)
- [The Protection of Freedoms Act 2012](#)
- [The Freedom of Information Act 2000](#)
- [The Education \(Pupil Information\) \(England\) Regulations 2005 \(as amended in 2016\)](#)
- [The Freedom of Information and Data Protection \(Appropriate Limit and Fees\) Regulations 2004](#)
- [The School Standards and Framework Act 1998](#)
- [The Children Act 1989](#)
- [The Children Act 2004](#)
- [The Equality Act 2010](#)

### **2.2. Guidance**

- [Surveillance Camera Code of Practice \(2021\)](#)

## **3. Definitions**

Surveillance: the act of watching a person or a place

CCTV: closed circuit television; video cameras used for surveillance

Covert surveillance: operation of cameras in a place where people have not been made aware they are under surveillance

#### **4. Covert Surveillance**

Covert surveillance will only be used in extreme circumstances, such as where there is suspicion of a criminal offence. If the situation arises where covert surveillance is needed (such as following police advice for the prevention or detection of crime or where there is a risk to public safety), a data protection impact assessment will be completed in order to comply with data protection law.

#### **5. Location of Cameras**

Cameras are located in places that require monitoring in order to achieve the aims of the CCTV system (stated in section 1.1).

Cameras are located in:

- Main reception lobby
- Front of school reviewing school main gate entrance and garages
- Rear of school reviewing playground area
- Rear of school reviewing back field area

Wherever cameras are installed appropriate signage is in place to warn members of the school community that they are under surveillance. The signage:

- Identifies the school as the operator of the CCTV system
- Identifies the school as the data controller
- Provides contact details for the school

Cameras are not and will not be aimed off school grounds into public spaces or people's private property.

Cameras are positioned in order to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

## **6. Roles and responsibilities**

### **6.1. The governing board**

The governing board has the ultimate responsibility for ensuring the CCTV system is operated within the parameters of this policy and that the relevant legislation (defined in section 2.1) is complied with.

### **6.2. The Headteacher**

- Take responsibility for all day-to-day leadership and management of the CCTV system
- Ensure that the guidance set out in this policy is followed by all staff
- Sign off on any expansion or upgrading to the CCTV system, after having taken advice from the DPO and taken into account the result of a data protection impact assessment

### **6.3. The School Business Manager**

- Take responsibility for all day-to-day leadership and management of the CCTV system
- Liaise with the data protection officer (DPO) to ensure that the use of the CCTV system is in accordance with the stated aims and that its use is needed and justified
- Ensure that the guidance set out in this policy is followed by all staff
- Review the CCTV policy to check that the school is compliant with legislation
- Ensure all persons with authorisation to access the CCTV system and footage have received proper training from the DPO in the use of the system and in data protection
- Sign off on any expansion or upgrading to the CCTV system, after having taken advice from the DPO and taken into account the result of a data protection impact assessment
- Decide, in consultation with the DPO, whether to comply with disclosure of footage requests from third parties
- Train persons with authorisation to access the CCTV system and footage in the use of the system and in data protection with guidance from the DPO
- Train all staff to recognise a subject access request with guidance from the DPO

- Inform subjects of how footage of them will be used by the school, what their rights are, and how the school will endeavour to protect their personal information, following guidance from DPO
- Ensure that the CCTV systems are working properly and that the footage they produce is of high quality so that individuals pictured in the footage can be identified, can be delegated to Site Manager
- Carry out termly checks to determine whether footage is being stored accurately, and being deleted after the retention period can be delegated to Site Manager

6.4. The site manager

- Take care of the day-to-day maintenance and operation of the CCTV system
- Oversee the security of the CCTV system and footage
- Check the system for faults and security flaws termly
- Ensure the data and time stamps are accurate termly

**7. Operation of the CCTV system**

The CCTV system will be operational 24 hours a day, 365 days a year.

The system will not record audio.

Recordings will have date and time stamps. This will be checked by the system manager termly and when the clocks change.

**8. Storage of CCTV footage**

Footage will be retained for 30 days. At the end of the retention period, the files will be overwritten automatically.

On occasion footage may be retained for longer than 30 days, for example where a law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation.

Recordings will be downloaded and encrypted, so that the data will be secure and its integrity maintained, so that it can be used as evidence if required.

The School Business Manager will carry out termly checks to determine whether footage is being stored accurately, and being deleted after the retention period.

## **9. Access to CCTV footage**

Access will only be given to authorised persons, for the purpose of pursuing the aims stated in section 1.1, or if there is a lawful reason to access the footage.

Any individuals that access the footage must record their name, the date and time, and the reason for access in the access log.

Any visual display monitors will be positioned so only authorised personnel will be able to see the footage.

### **9.1. Staff access**

The following members of staff have authorisation to access the CCTV footage:

- The headteacher: Mr Mark White
- The deputy head: Ms Sarah Rose
- The School Business Manager: Ms Mandy Wilkinson
- The data protection officer: Representative from Judicium, school appointed DPO
- The site manager: Mr Andrew Burton
- Anyone with express permission of the Headteacher or deputy headteacher

CCTV footage will only be accessed from authorised personnel's work devices, or from the visual display monitors.

All members of staff who have access will undergo training to ensure proper handling of the system and footage.

Any member of staff who misuses the surveillance system may be committing a criminal offence, and will face disciplinary action.

### **9.2. Third-party access**

Where a person other than those mentioned above, 9.1, requests access to the CCTV data or system, the Headteacher must satisfy

him/herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists, access will be refused. CCTV footage will only be shared with a third party to further the aims of the CCTV system set out in section 1.1 (e.g. assisting the police in investigating a crime).

Footage will only ever be shared with authorised personnel such as law enforcement agencies or other service providers who reasonably need access to the footage (e.g. investigators).

The school will comply with any court orders that grant access to the CCTV footage. The school will provide the courts with the footage they need without giving them unrestricted access. The Headteacher will seek advice from the DPO regarding very careful consideration of how much footage to disclose, and seek legal advice if necessary.

## **10. Security**

- The site manager will be responsible for overseeing the security of the CCTV system and footage
- The system will be checked for faults once a term
- Any faults in the system will be reported as soon as they are detected and repaired as soon as possible, according to the proper procedure
- Footage will be stored securely and encrypted wherever possible
- The CCTV footage will be password protected and any camera operation equipment will be securely locked away when not in use
- Proper cyber security measures will be put in place to protect the footage from cyber attacks
- Any software updates (particularly security updates) published by the equipment's manufacturer that need to be applied, will be applied as soon as possible

## **11. Requests for Access by the Data Subject**

The Data Protection Act provides data subjects – those whose image has been captured by the CCTV system and can be identified - with a right to access data held about themselves, including those obtained by CCTV. Requests for such data should be made the School Business Manager.

**12. Complaints**

Complaints should be directed to the headteacher and should be made according to the school's complaints policy.

**13. Monitoring**

The policy will be reviewed bi-annually by School Business Manager to consider whether the continued use of a surveillance camera remains necessary, proportionate and effective in meeting its stated purposes.

**14. Links to other policies**

- Data protection policy
- Privacy notices for parents, pupils, staff, governors and suppliers
- Safeguarding policy

**15. Changes**

Description	Date	Page	Section