



# Triumph Learning Trust

Aspiration - Collaboration - Innovation

## CCTV Policy

### Policy Details

<b>Policy Level</b>	Trust
<b>Document Approver</b>	Trust Board
<b>Document Status</b>	Final
<b>Applicable to</b>	All Trust Employees
<b>Review Frequency</b>	Every 3 Years

### Revision History

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## 1. Introduction

The purpose of this document is to regulate the management, operation, and use of closed-circuit television (CCTV) and other recording devices. Triumph Learning Trust uses closed-circuit television images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for students, staff, and visitors, to prevent the loss or damage to property and to assist in the investigation of accidents, incidents and near misses.

The CCTV system is owned, operated and monitored by each school and the deployment of which is determined by the school's leadership teams, in line with this policy.

The introduction of, or changes to, CCTV monitoring will be shared with representatives, staff, and the school community.

The school's CCTV scheme is registered with the Information Commissioner under the terms of the Data Protection Act and meets all GDPR (General Data Protection Regulation)

Regulations including:

- Why Triumph Learning Trust requires CCTV surveillance and how we will use these systems appropriately
- How surveillance should be considered according to laws, regulations, codes of practice and standards.
- What elements of privacy will need to be considered before using CCTV surveillance
- How to store and process CCTV records in accordance with the GDPR's data processing principles
- Advertising CCTV systems and recording on the premises
- Selecting surveillance systems and outsourcing partners
- Assigning roles and responsibilities regarding CCTV
- The use of CCTV, and the associated images is covered by the Data Protection Act. This policy outlines the school's use of CCTV and how it complies with the Act.

All authorised operators and employees approved to access images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the school's data controller in their responsibilities as part of the requirements of this policy document, the school's safeguarding policies and procedures, e-safety information, and the Data Protection Act. All employees are aware of the restrictions in relation to storage of, access to, and disclosure of, recorded images and sound. Failure to adhere to these requirements could lead to disciplinary action.

The trusts Data Protection Policy and Data Retention and Destruction Policy should also be referred to.

## 2. Statement of intent

The Trust complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The checklist of operation is adapted. Further information is available at:

ICO [Code](#) of Practice

CCTV warning signs will be clearly and prominently placed at external entrances to the schools, including main staff/student and visitor entrances and school gates, as coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV). In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

The design of the system should minimise any invasion of privacy and ensure that the scheme will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will fully meet this brief or detect every single incident taking place in the areas of coverage.

CCTV data will not be used in any aspect of performance management, unless with the written consent of the employee concerned.

### **3. Siting the Cameras**

Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that civil rights and privacy are not violated. The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. Cameras will be regularly checked to ensure they have not been moved or tampered with in any way.

The school will make every effort to position cameras so that their coverage is restricted to the school's premises, which may include outdoor areas.

CCTV will also be used in communal areas and classrooms which have high valued equipment for and for professional development opportunities. Members of staff upon request will have access to details of where CCTV cameras are situated, (see section 4).

Only suitably competent contractors with the relevant knowledge and experience will be employed to install and maintain the equipment.

### **4. Covert Monitoring**

Covert monitoring should not normally be considered, and should only be used in exceptional circumstances, for example:

- Where there is good cause to suspect that a criminal activity or equivalent malpractice which may constitute gross misconduct
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording

In these circumstances written authorisation must be obtained from the Headteacher and CEO before allowing such an operation to take place. Covert monitoring must cease following completion of an investigation.

## **5. Storage and Retention of CCTV Images**

Recorded data will be stored for a minimum of 31 Days (\*) and not retained for longer than is necessary than to meet the purposes of the recording. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

All retained data will be stored securely. Access will be limited to named operators/staff only whose access is authorised by the Headteacher.

Please consult the TLT Records Management and Retention Policy in conjunction with this document.

## **6. Access to CCTV Images**

Access to recorded images will be restricted to those staff authorised to view them by the Headteacher. A list of staff authorised to view images from this CCTV system will be held by the school.

A log will be maintained of when CCTV footage is accessed and reviewed (name of reviewer, date & reason).

## **7. Subject Access Requests**

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

All requests must be made in writing to the Operations Manager. Individuals submitting requests for access will have to provide sufficient information to enable the footage relating to them to be identified & Isolated. We would require: date, time and location within 30 days.

The school will respond to the request in one calendar month of receiving the written request.

The school reserves the right to refuse access to the CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation. Where images of other individuals are on the CCTV footage their permission will be sought before access is allowed.

## **8. Access to and Disclosure of Images to Third Parties**

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. Investigators).

Requests should be made in writing to the Operations Manager.

The data may be used within the Trust's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

## 9. Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance. The Trust has a complaints Policy which should be referred to for further advice as to how to make a complaint.

Failure of authorised operators/staff to comply with the requirements of this policy will lead to disciplinary action under the Trust's Disciplinary procedure.

## 10. Further Information, Guidance and Legislation

Further information and guidance on CCTV and its use is available from the following sources:

Data Protection Code of Practice for surveillance cameras and personal information (published by the Information Commissioners Office [www.ico.org.uk](http://www.ico.org.uk) )

The Government's Surveillance Camera Code of Practice 2013:

[https://assets.publishing.service.gov.uk/media/5a7b91a240f0b62826a046c0/Surveillance\\_Camera\\_Code\\_of\\_Practice\\_WEB.pdf](https://assets.publishing.service.gov.uk/media/5a7b91a240f0b62826a046c0/Surveillance_Camera_Code_of_Practice_WEB.pdf)

Regulation of Investigatory Powers Act (RIPA) 2000:

Data Protection Act: <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

Freedom of Information Act: <https://www.legislation.gov.uk/ukpga/2000/36/contents>

Protection of Freedoms Act:

<https://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>

Crown Prosecution Service: [www.cps.gov.uk](http://www.cps.gov.uk)