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# CCTV POLICY

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**RAEDWALD**  
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RATIFIED BY THE TRUST BOARD IN:  
SEPTEMBER 2020

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## CCTV POLICY

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<b>Policy author:</b>	Angela Ransby
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<b>CEO Signature:</b>	Angela Ransby
<b>Trust Board Signature:</b>	Roger Fern

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## 1. Introduction

1.1 Some Raedwald Trust (RT) Academies use closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.

1.2 All RT CCTV systems comprise fixed cameras both internally and externally to provide coverage of the gates, doorways, corridors and outside areas.

1.3 RT CCTV systems do not have sound recording capability.

1.4 RT CCTV systems are owned and operated by the Academy in which they are placed, and their deployment is determined by the Head Teacher Executive Group (HEG)

1.5 The precise location of RT CCTV systems in each of RT Academies can be provided by contacting RT Trust Business Managers: [tbm@raedwaldtrust.org](mailto:tbm@raedwaldtrust.org)

1.6 Any changes to CCTV monitoring will be subject to consultation with HEG.

1.7 The RT CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 2018. This policy outlines the school's use of CCTV and how it complies with the Act.

1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by Trust Business Managers/Head Teacher in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

## 2. Statement of Intent

2.1 The school 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 Code of Practice is published at:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/codes-of-conduct/>

2.2 CCTV warning signs will be clearly and prominently displayed where CCTV cameras are deployed in and around the school site. Signs will contain details of the purpose for using CCTV.

2.3 The planning and design has endeavoured 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

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taking place in the areas of coverage.

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

3.1 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 reasonable privacy expectations 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 2018.

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

3.3 CCTV may be used in classrooms.

3.4 Members of staff should have access to details of where CCTV cameras are situated. The exception stated in the Code of Practice is if cameras are placed for the purpose of covert monitoring (see below).

### **4. Covert Monitoring**

4.1 Raedwald Trust Academies may in exceptional circumstances set up covert monitoring. For example:

- i) Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

4.2 In these circumstances authorisation must be obtained from the Head Teacher.

4.3 Covert monitoring must cease following completion of an investigation.

4.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilets.

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

5.1 Recorded data will not be retained for longer than is necessary, (up to a maximum of 30 days). 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.

5.2 All retained data will be stored securely on a password protected or encrypted hard drive which will be stored in a lockable cupboard with limited access by CEO, Trust Business Managers, Head Teachers, Heads of School and designated office staff.

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## 6. Access to CCTV images

6.1 Access to recorded images will be restricted to those staff authorised to view them (CEO, Trust Business Managers, Head Teachers and Heads of School) and will not be made more widely available.

## 7. Subject Access Requests (SAR)

7.1 Individuals have the right to request access to CCTV footage relating to themselves under the General Data Protection Regulations. Please refer to our SAR procedures laid out on our website

7.2 Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

7.3 The school will respond to requests within 14 days of receiving the written request.

7.4 The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

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

8.1 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).

8.2 Requests should be made in writing to the Head Teacher.

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

## 9. Complaints

9.1 Complaints and enquiries about the operation of CCTV within a RT Academy should be directed to the Head Teacher in the first instance.

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

[CCTV Code of Practice Revised Edition 2008](#) (published by the Information Commissioners Office)

- [www.ico.gov.uk](http://www.ico.gov.uk)
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018