

# CCTV & Surveillance Policy

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V1.0	12/12/2018	N McDermott	First published version
V1.1	19/12/2019	N McDermott	Minor updates to aid reading ease. Compilation of schools' schedule. Addition of clause 3.6 and 3.7.
V 1.2	23/09/2020	N McDermott	Update to Appendix 1 Okehampton College specific details
V 1.3	02/03/2021	J Coundon	Updated CEO & DPO details. Removed camera location details and Okehampton College diagram
V1.4	02/12/22	M Greener	New policy template from Education Data Hub that incorporates legislative changes
V1.5	15/05/23	M Butler	Updates to clauses: 1.1, 1.2, 2.1, 3.3 for recording devices on vehicles Addition of clause 3.9 Updates to Annexe 5

This document will be reviewed annually and sooner when significant changes are made to the law.

Guidance from the Department for Education about school policies can be found here:  
<https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts>

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## 1. Introduction

- 1.1 The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system of any of the premises within **or vehicles operated by, or on behalf of**, Dartmoor Multi Academy Trust.
- 1.2 The system comprises a number of fixed cameras located around the school site **and removable cameras on vehicles transporting Trust students**. All CCTV recorders are password protected and monitoring is only available to authorised staff.
- 1.3 This Policy follows Data Protection guidelines, including guidance from the Information Commissioner's Office and the Surveillance Camera Commissioner.
- 1.4 The CCTV system is owned by the school/Trust.
- 1.5 Authorised Staff
  - Principal
  - Senior Leadership Team Members
  - Premises Manager
  - Designated Safeguarding Leads

## 2. Purposes of the CCTV scheme

- 2.1
  - (a) To protect the school buildings and their assets
  - (b) To protect the school or third party vehicles**
  - (c) To increase personal safety and reduce the fear of crime
  - (d) To support the Police in a bid to deter and detect crime
  - (e) To assist in identifying, apprehending and prosecuting offenders
  - (f) To assist with the safeguarding and supervision of pupils
- 2.2 The Trust/school has identified the following legal bases for processing CCTV footage which will include personal data; UK GDPR Article 6(1)e (public task) and Article 9(2)(g) (substantial public interest) and Data Protection Act 2018 Schedule 1, paragraph 10 (preventing or detecting unlawful acts) and paragraph 36 processing criminal category data for purposes of substantial public interest.

## 3. Statement of intent

- 3.1 The Trust/School will seek to comply with the requirements both of the Data Protection Act and the Surveillance Camera Commissioner's Code of Practice.
- 3.2 The Trust/School will treat the system and all information, documents and recordings obtained and used as personal data which are protected by the Act.
- 3.3 Cameras will be used to monitor activities within the school **and on vehicles** to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of members of the school community and members of the public.

- 3.4 Materials or knowledge obtained as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Recordings will never be released to the media for purposes of entertainment.
- 3.5 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 taking place in the areas of coverage.
- 3.6 Cameras will not record any private premises.
- 3.7 Signs that inform people of the existence of CCTV, as required by the Code of Practice of the Information Commissioner have been placed at access routes to areas covered by the school CCTV.
- 3.8 A log is kept of Authorised Staff access to Recorded Images ([Annexe 2](#))
- 3.9 Materials or knowledge obtained as a result of CCTV footage recorded on third party vehicles will remain the sole property of Dartmoor Multi Academy Trust except for use in the investigation of a specific crime and with the written authority of the police.

## 4. Operation and Access to the system

- 4.1 The Scheme is administered and managed by the Principal, in accordance with the principles and objectives expressed in this policy.
- 4.2 Images can be accessed within the schools and is limited by physical (locked office), technical (password protection) or a combination of both controls.
- 4.3 Live feeds are available in the main reception from the CCTV recorder control console. Live feeds are available to authorised staff for the management of the school, security of the site and safety of staff and pupils.
- 4.4 The CCTV system will be operated 24 hours each day, every day of the year.
- 4.5 CCTV recordings will be available for a maximum of 30 days unless copied to removable media (CDs, DVDs or Tapes etc). After this time any recordings will be automatically overwritten. Where CCTV is copied to be retained for longer periods this will be documented and justified in the Access Log. In this case, the footage will be held in accordance with the School Retention Schedule.

## 5. Printed and Recording Media Procedures

- 5.1 In the event of an incident requiring footage from the system to be retrieved and stored the following procedure should be followed: -
  - The details of the incident should be passed to the principal, who will authorise the use of the system by an authorised user.
  - The relevant footage will be identified.
  - An entry shall be made on the Recorded Image Viewing Log.

- If the footage is required for investigation, then the User will produce a copy. The Date and Time of the recorded extract will be registered and stored in a secure place.
- The footage may only be viewed by Authorised Staff.
- A record of all viewings shall be made, which if required as evidence, may be released to the Police.
- Applications received from outside bodies or Subject Access Requests to view or release records will be notified to the principal.

## 6. Assessment of the System

- 6.1 Named individual responsible for system or a delegated person will check and confirm the screen and cameras are working weekly.
- 6.2 Regular reviews of the system's operation will take place and any necessary changes in procedure and camera sighting/position will be implemented.
- 6.3 The Principal and DPO will carry out an annual review of the use of CCTV, using the Annual Review Checklist below.
- 6.4 The school will carry out a Data Protection Impact Assessment to review the use of CCTV whenever there is any significant change to the use of the system or the purpose for which is it used.
- 6.4 If out of hours emergency maintenance arises, the Principal, Site Manager or School Business Officer must be satisfied of the identity and purpose of contractors before allowing entry.

## 7. Breaches of the policy (including breaches of security)

- 7.1 Any breach of this Policy by school staff will be initially investigated by the principal, for him/her to take the appropriate disciplinary action.
- 7.2 Any serious breach of this Policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

## 8. Complaints

- 8.1 Any complaints about the school's CCTV system should be addressed to the principal.
- 8.2 Complaints will be investigated in accordance with the Trust's Complaint Policy.

## 9. Access by the Data Subject

- 9.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to access copies of data held about themselves, including those obtained by CCTV.

9.2 Requests for Data Subject Access should be made in accordance with the Subject Access Request Procedure.

## Annexe 1: CCTV System Annual Review Form

CCTV SYSTEM ANNUAL REVIEW			
<b>School:</b>		<b>Date:</b>	
<b>Reviewed by:</b>		<b>Signed:</b>	

Review Statement	Satisfactory		Problems Identified?	Corrective Action Required (if relevant)
	Yes	No		
The school is registered with the Information Commissioner's Office and the next renewal date				
There is a named individual who is responsible for operation of the system.				
The problem we are trying to address has been clearly defined and installing cameras is the best solution.				
The CCTV system is addressing the needs and delivering the benefits that justified its use.				
The system equipment produces clear images which the police can use to investigate crime, and these can easily be taken from the system when required.				
Cameras have been sited so that they provide clear images.				
Cameras have been positioned to avoid capturing images of people who are not visiting the premises.				
There is sufficient suitable signage notifying people that CCTV monitoring is in operation, including our contact details where it might not be obvious that the system is managed by this				
Information is available to help deal with queries about operation of the system and how individuals can make access requests.				

Sufficient safeguards are in place to protect wireless transmission systems from interception.				
There are sufficient controls and safeguards in place if the system is connected to, or made available across, a computer, e.g. an intranet.				

Review Statement	actory		Problems Identified?	Corrective Action Required (if relevant)
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to				
Recorded data will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.				
The process for deleting data is effective and being adhered to.				
Except under the direction of an appropriate public authority (usually police), images will not be provided to third parties, unless the principal has approved the disclosure of the data under the advice of the DPO.				
When information is disclosed, it is transmitted as securely as possible e.g. viewed on school premises, hand delivered/collected in person on a device, a fully tracked				
Staff are trained in security procedures and there are sanctions in place for any misuse of surveillance system				
Regular checks are carried out to ensure that the system is working properly and produces high quality and useful data.				
There is a system in place to ensure that any manufacturer recommended CCTV system and equipment updates, especially of security software are regularly sought, applied and checked as properly functioning.				



## Annexe 2: CCTV Recorded Image Access Log

CCTV Recorded Image Access Log					
Authorised Staff Name	Camera Number/Location	Date and Time of recording	Reason for Viewing (e.g. Vandalism, Behaviour incident)	Further Action Taken (e.g. any images/recordings saved or shared?)	Notes- e.g. Authorisation for sharing/retention period for retained images

## Annexe 3: CCTV Operator Agreement

### CCTV OPERATOR AGREEMENT

People authorised to view the recordings are set out in the CCTV Policy.

I confirm I have read and understood the CCTV Policy and agree to adhere by the rules of the policy as an operator of this system.

In addition, I will update the CCTV Recorded Image Access Log each time I access the system to review a recording. I will:

- record the reason for viewing any images
- detail any retained images, why these were retained and diarise to review saved images for deletion
- I will ensure any retained images are password protected.
- I understand images including retained images must not be shared with third parties, including staff who are not part of the senior leadership team.
- any shared images must have approval for sharing from the principal.

Name of authorised operator:

Signature:

Date:

I confirm that \_\_\_\_\_ is an authorised operator of the CCTV system.

[Headteacher:

Date:

# CCTV & Surveillance Policy

## Annexe 4: CCTV Notice





# **THESE PREMISES ARE PROTECTED BY 24 HOUR CCTV RECORDING**

**Images are being monitored for the purpose of public safety, crime prevention, detection and prosecution of offenders.**

**The scheme is controlled by:**

**<NAME OF> PRIMARY SCHOOL**

**For further information contact:**

**THE SCHOOL OFFICE TEL NO: <XXXXX>**

## Annexe 5: CCTV and Surveillance: School specific information

SCHOOL NAME	CCTV	Number of Cameras	Named individual responsible for system	Named roles with authority to view images on CCTV <sup>1</sup>	Record function	Storage location	Image retention period	Service and Maintenance Contractor
Black Torrington Primary	No							
Bradford Primary	No							
Bridgerule Primary	<b>Yes</b>	2	Ian Warn	Principal Premises Manager Named individuals as per Appendix 3 form	Continuous	School	14 days max	Independent Fire and Security
Bridestowe Primary	<b>Yes</b>	2	Mark Butler	Principal Premises Manager Named individuals as per Appendix 3 form	On motion	Remote	30 days max	Hub IT System Manager
Boasley Cross Primary	No							
Chagford Primary	<b>Yes</b>	1	Mark Butler	Principal Premises Manager Named individuals as per Appendix 3 form	On motion	School	30 days max	TBC
Exbourne Primary	No							
Highampton Primary	No							

<sup>1</sup> or authorise others to view for identification.

Holsworthy Community College	Yes	61	Ian Warn	Principal Premises Manager Named individuals as per Appendix 3 form	Continuous	School	14 days max	Independent Fire and Security
Lydford Primary	No							
Northlew Primary	No							
North Tawton Primary	No							
South Tawton Primary	No							
Okehampton Primary School	Yes	10	Mark Butler	Principal Premises Manager Named individuals as per Appendix 3 form	Continuous	School	30 days max	Metcalfe Allen
Okehampton College	Yes	96	Carol Newman	Principal Premises Manager Named individuals as per Appendix 3 form	Internal: on motion External: continuous	School	30 days max	Mark Butler
Tavistock College	Yes	85	Matthew Wyatt	Principal Premises Manager Named individuals as per Appendix 3 form	Continuous	School	14 days	IFS
The Promise	Yes	31	Mark Butler	Principal Premises Manager Office Manager Named individuals as per Appendix 3 form	Continuous	School	30 days max	Mark Butler

## Annexe 6: Surveillance Systems Access Log

Name of person accessing system	Purpose of access	Date	Time	Identity checked by	Visit approved by	Notes To include details of any data removed

