

# CHANCERY EDUCATION TRUST

## CCTV POLICY

**OCTOBER 2023**

Next Review Date: October 2025

*Staff should make themselves aware of all policies and amendments or updates to policies and adhere to the same, which will be made available on relevant websites and internal data and computer systems.*

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# CHANCERY EDUCATION TRUST

## CCTV POLICY

### Introduction

The Chancery Education Trust and all the Academy Schools within the Trust, recognises that CCTV systems can be privacy intrusive.

The system comprises of a number of cameras located around the Academy School site. All cameras can be monitored from controlled, secure, locations.

The CCTV system is installed by Trustee Fire & Security.

The CCTV system and data is owned by the individual Academy School.

### Objectives

Review of this policy shall be repeated regularly, and whenever new equipment is introduced a review will be conducted and a risk assessment put in place. We aim to conduct reviews no later than every two years.

The purpose of the CCTV system is to assist the Academy Schools in reaching these objectives:

- To assist in managing the Academy School;
- To protect the Academy School buildings and assets of those buildings;
- To support the police in preventing and detecting crime;
- To increase a sense of personal safety and reduce the fear of crime;
- To assist in identifying, apprehending and prosecuting offenders;
- To protect members of the public, pupils, staff and visitors against harm to their person and/or private property; and
- To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence

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## Purpose of This Policy

The purpose of this Policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at the Academy School. The CCTV system used by the Academy School comprises of:

| CAMERA TYPE     | LOCATION                                     | SOUND | RECORDING CAPACITY | SWIVEL / FIXED |
|-----------------|--|-------|--------------------|----------------|
|                 |  | Y/N   | Y/N                | S/F            |
| CCTV            | Staff Car Park                               | N     | Y                  | F              |
| CCTV            | Main Parent Reception                        | N     | Y                  | F              |
| CCTV            | Main Gate Path                               | N     | Y                  | F              |
| CCTV            | Reception Outdoor Area                       | N     | Y                  | F              |
| CCTV            | Main Electronic Gate                         | N     | Y                  | F              |
| CCTV            | Internal Offices/Training & Conference Rooms | Y     | Y                  | F              |
| CCTV            | Internal Storage Areas                       | Y     | Y                  | F              |
| CCTV            | Rear gate/field area                         | N     | Y                  | F              |
| Thermal Imaging | Reception                                    | N     | Y                  | F              |

CCTV Cameras are not installed in areas in which individuals would have an expectation of privacy such as toilets, changing facilities, etc.

## Statement of intent

CCTV Cameras are installed in such a way that they are not hidden from view. Signs are predominantly displayed where relevant, so that staff, students, visitors and members of the public are made aware that they are entering an area covered by CCTV. The signs also contain contact details as well as a statement of purpose for which CCTV is used.

The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.

The Academy School will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

The system has been designed so far as possible to deny observation on adjacent private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design has endeavoured to ensure that the system 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.

Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible on the site and make clear who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

CCTV images are not retained for longer than necessary, taking into account the purposes for which they are processed. Data storage is automatically overwritten by the system after a period of 23 days at Darrick Wood Infant & Nursery School (DWINS), and 31 days at John Wood School & Nursery (JWSN) & Pickhurst Academy (PCK).

Recorded images 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. In the absence of compelling a need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 6 months.

## **System Management**

Access to the CCTV system and data shall be password protected and will be kept in a secure area.

The CCTV system will be administered and managed by the Site Manager/Caretaker who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager the system will be managed by the Chief Executive Officer (CEO).

The system and the data collected will only be available to the Systems Manager, his/her replacement and appropriate members of the senior leadership team as determined by the Headteacher/Principal.

The CCTV system is designed to be in operation 24 hours each day, 7 days of the week, though the Academy School does not guarantee that it will be working during these hours.

The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.

Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by providing clear, usable images.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

Where a person other than those mentioned in above, requests access to the CCTV data or system, the System Manager 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.

Details of all visits and visitors will be recorded in a system log book including time/data of access and details of images viewed and the purpose for so doing.

### **Downloading Captured Data Onto Other Media**

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures: -

- (a) Each downloaded media must be identified by a unique mark.
- (b) Before use, each downloaded media must be cleaned of any previous recording.
- (c) The System Manager will register the date and time of downloaded media insertion, including its reference.
- (d) Downloaded media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a downloaded media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.
- (e) If downloaded media is archived the reference must be noted.
- (f) If downloaded media is put onto a device, the device will be encrypted and password protected.

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his/her replacement and the Headteacher/Principal and other authorised senior leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable, if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the downloaded media (and any images contained thereon) remains the property of the Academy School, and downloaded media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The Academy School also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the Academy School to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until they are needed by the police.

Applications received from outside bodies (e.g. solicitors or parents) to view or release images will be referred to the Academy School's Data Protection Officer and a decision made by a senior leader of the Academy School in consultation with the Academy School's data protection officer.

## Complaints

Any complaints about the Academy School's CCTV system should be addressed to the Chief Executive Officer (CEO) of the Trust.

## 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 to: [office@chanceryeducation.com](mailto:office@chanceryeducation.com).

## Monitoring and Implementation Policy

The policy is reviewed no later than every two years, although the Trust may vary or amend it periodically to ensure that we fulfil our obligation around the CCTV Policy. All proposed changes to this policy would be made following the approval from the Committee.

|                            | Name            | Date                          |
|----------------------------|-----------------|-------------------------------|
| Policy written by          | CET Board       | October 2023                  |
| Review by Committee        | CET Board       | October 2023                  |
| Agreed by Committee        | CET Board       | November 2023                 |
| Adopted by Governing Board | CET Board / LGB | December 2023 / February 2024 |
| To be reviewed annually    |                 |                               |
| Review by                  | October 2025    |                               |

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