

The GALLERY TRUST



A community of special schools

CCTV Policy

Date of Policy	June 2024
Date of review	September 2027
SLT Lead	COO
Signed: Chief Executive Officer	_____
Chair of Trustees	_____

Introduction

The CCTV is solely for the detection and prevention of crime and to protect staff, students and the reputation of the school and as such only authorised members of staff are ordinarily allowed to view the footage.

This policy also details the use and management of CCTV systems across The Gallery Trust and details the procedures to be followed to ensure compliance.

This policy applies to all CCTV systems including: Surveillance cameras mounted on buildings and poles, Automatic Number Plate Recognition, Body worn cameras, webcams, covert installations and any other system capturing images of identifiable individuals for the purpose of monitoring and/or recording their activities.

Data Protection

The Gallery Trust seeks to operate its CCTV systems in a manner that is consistent with respect for the individual's privacy.

The use of CCTV, and the associated images and any sound recordings, is covered by data protection legislation.

The school will comply 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/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

It is a requirement to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school will ensure that this requirement is fulfilled.

CCTV Systems and management

All CCTV Systems in use across The Gallery Trust are owned by The Gallery Trust and managed by the school and its appointed agent. The data controller for CCTV images is The Gallery Trust, which is registered with the ICO.

Compliance with GDPR and Data Protection legislation is conducted by the Trust's Data Protection Officer, Satswana Ltd.

Clearly visible signs will be placed at all pedestrian and vehicular entrances to inform staff, pupils, parents, visitors and members of the public that CCTV is operational.

The CCTV System is operational and capable of being monitored for 24 hours a day, 365 days a year.

Any CCTV installation shall be subject to a Data Protection Impact Assessment

The principal purpose of CCTV in The Gallery Trust is:

- For the prevention, reduction, detection and investigation of crime.
- To ensure the safety of staff, pupils, parents, visitors and members of the public.

All cameras must be physically inspected regularly to ensure they remain operational, and images remain fit for purpose. Each physical camera position should then be cross-checked in the monitor and recording system to ensure the image is being received and is of suitable quality.

The CCTV system is not to be used to carry out lesson observations.

Siting the Cameras

Cameras are 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 data protection.

The school has positioned cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

Members of staff have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

All cameras installed shall provide images that are of a suitable quality for the specific purpose for which they are installed.

The use of cameras in areas where one would normally expect a degree of privacy should be clearly identified and documented, not located looking into toilets or changing areas. Cameras are not permitted in any area where it is possible to see people using the toilet or changing. This excludes hand washing areas.

Storage and Retention of CCTV images

Recorded data will not be retained for longer than is necessary, typically no longer than 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.

All retained data is stored securely at the establishment, and access to recorded images is restricted to those staff authorised to view them, and will not be made more widely available.

Images and CCTV data held in excess of normal retention periods must be reviewed quarterly, and any data no longer required for evidential purposes deleted.

Images are recorded on Digital Video Recorders (DVRs) located within a restricted area. Only authorised staff are allowed access, and only CCTV trained staff are permitted to view or make copies of the images.

Additional staff may also be authorised to monitor cameras on a view only basis by the Head Teacher and/or Chief Operating Officer.

A log shall be maintained by the Trust's Digital Strategy and Network Manager of all requests to access recorded images, along with any action taken thereafter, this will then be shared with the Chief Operating Officer.

Subject Access Requests (SAR)

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

All requests should be made in writing to the Head Teacher. 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.

The school will respond to requests within 40 calendar days of receiving the written request and fee.

A fee of £10 will be charged per request.

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

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 Head Teacher.

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.

Monitoring Compliance

All staff involved in the operation of The Gallery Trust's CCTV systems will be made aware of this policy and are only authorised to use CCTV systems in a way that is consistent with the purpose and procedures herein.

All staff with responsibility for accessing, recording, disclosing or otherwise processing data within the CCTV systems, or anyone with a responsibility for maintaining any part of the CCTV systems is required to have undertaken data protection training. CCTV should only be accessible to the Head or other senior members of staff.

Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Head Teacher or the Chief Operating Officer.