



CCTV Policy

The Children's Endeavour Trust comprises:

- Abbot's Hall Community Primary School
- Bosmere Community Primary School
- Broke Hall Community Primary School
- Chilton Community Primary School
- Combs Ford Primary School
- Freeman Community Primary School
- Springfield Junior School
- Whitehouse Community Primary School

Document Control

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1. Introduction and Aims

The Children's Endeavour Trust and its schools (collectively referred as "CET" or "Trust") is committed to protecting the rights and freedom of all individuals in relation to the processing of their data.

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) Systems at CET and relevant schools that use CCTV. It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the schools and members of the public) regarding their rights in relation to personal data recorded via the CCTV system.

The CCTV system is administered and managed by individual schools within the Trust, who act as the Data Controller. This policy will be subject to review from time to time and should be read with reference to the Trust's Privacy Notice. For further guidance, please review the [Information Commissioner's CCTV Code of Practice](#).

2. Legislation and guidance

This policy meets the requirements of:

- UK General Data Protection Regulation (UK GDPR) – the EU GDPR was incorporated into UK legislation, with some amendments, by [The Data Protection, Privacy and Electronic Communications \(Amendments etc\) \(EU Exit\) Regulations 2020](#)
- [Data Protection Act 2018 \(DPA 2018\)](#)
- CCTV code of Practice published by the Information commissioner's Office (ICO) reflects the [GDPR](#) and [code of practice](#) for the use of surveillance camera and personal information.
- [Surveillance Camera Code of Practice](#)

3. Purpose

CCTV surveillance at the schools within CET Trust is intended for the purposes of:

- Protecting the school's buildings and school assets, both during and after school hours.
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
- Supporting the police in a bid to deter and detect crime.
- Assisting in identifying, apprehending and prosecuting offenders.
- To provide support for the health and safety, security and integrity of the school sites.
- The purpose of safeguarding.

Some systems within our Trust have sound recording capability.

4. Positioning

All CCTV cameras on the school sites inside and out, will be located in such a way to meet the purpose for which the CCTV is operated. Cameras will be sited in a prominent position where they are clearly visible to employees, pupils, visitors and members of the public.

All fixed cameras are in plain sight on the school's premises with clear signage. The school's do not routinely use CCTV for covert monitoring or monitoring of private property outside of the school's grounds.

CCTV will not be used in classrooms but in areas within school sites that have been identified by staff and pupils as not being easily monitored.

Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.

Members of staff will have access to details of where CCTV cameras are situated.

5. Maintenance

The CCTV systems will be operational 24 hours a day, every day of the year.

CCTV systems and cameras will be checked regularly.

6. Live viewing and recordings

The viewing of live or recorded CCTV images is restricted to authorised employees approved by the headteacher within each school.

Schools will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images.

Recorded images will be stored in a way that ensures their integrity (e.g. password protected or encrypted) and in a way that allows specific times and dates to be identified.

Recorded data will not be retained for longer than is necessary.

The Trust reserves the right to use images captured on CCTV where there is activity that the Trust cannot be expected to ignore such as criminal activity, safeguarding, potential misconduct/gross misconduct, or behaviour which puts others at risk.

Images retained for evidential purposes will be retained in a locked area accessible by a school's CCTV system administrator only.

The headteacher or authorised personnel may give access to CCTV images:

- Where required to do so by the headteacher, the Police or some relevant statutory authority.
- To make a report regarding suspected criminal behaviour.
- To enable the Designated Safeguarding Lead within each school, to examine behaviour which may give rise to any reasonable safeguarding concern
- To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
- In any other circumstances required under law or regulation.

7. Disclosure of images

Individuals have the right to request access to CCTV footage relating to themselves under the UK General Data Protection Regulations. Please refer to our Subject Access Request

If the footage contains images of other individuals, the schools must consider whether:

- The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
- The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
- If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
- Requests under the Freedom of Information Act will be considered following the guidance in the ICO's CCTV Code of Practice.

8. Disclosure of recorded images to third parties

A school within the Trust must only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with Data Protection Legislation.

CCTV images will only be disclosed to the Police in line with the purposes for which the CCTV system is in place.

The schools within the Trust reserve the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

9. Retention

Recordings will be retained for a limited time period only and for no longer than their intended purpose. This will be up to a maximum of 31 days; all recordings will be overwritten.

Downloaded recordings for subject access requests and third parties are to be generally retained for six months unless the Police requests that they be retained for a longer period of time.

10. Links with other policies

This CCTV policy is link to our:

- Data protection
- Privacy notices
- Subject access requests