



# CCTV and Surveillance Policy

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| <b>APPROVED BY:</b>       | FARE Committee                  |
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## 1 OBJECTIVE & SCOPE

The Agora Learning Partnership is committed to securing the safety and well-being of employees, students and others affected by activities on the school premises.

Aims:

- To protect the academy buildings and their assets
- To increase personal safety and reduce the fear of crime
- To support the police in a bid to deter and detect crime
- To provide evidence for the Trust to use in its internal investigations
- To protect members of the school community
- To determine the cause of accidents

## 2 INTRODUCTION

2.1 The Trust has in place CCTV surveillance systems at some of its academies. The sites are listed in Appendix One and will be updated as and when the policy is updated. The purpose of this policy is to set out the responsibilities of the Trust regarding the management, operation and use of the CCTV systems and details the procedures to be followed in order to ensure that the Trust complies with relevant legislation.

2.2 This policy covers the use of surveillance and CCTV systems which capture moving and still images of people who could be identified, as well as information relating to

individuals for any of the following purposes:

- Observing what an individual is doing.
- Taking action to prevent a crime.
- Using images of individuals that could affect their privacy.

2.3 This policy applies to all members of our staff, visitors to the site and all other persons whose images may be captured by the CCTV system.

2.4 The system comprises a number of fixed and dome cameras located around the academies sites.

2.5 This policy takes into account all applicable legislation and guidance, including:

2.5.1 UK General Data Protection Regulation (UK GDPR)

2.5.2 Data Protection Act 2018

2.5.3 CCTV Code of Practice produced by the Information Commissioner's Office (ICO)

2.5.4 Human Rights Act 1998

2.5.5 Freedom of Information Act 2000

2.6 The policy will be subject to review biennially to include consultation as appropriate with interested parties.

2.7 The CCTV systems are owned by the schools.

### **3 STATEMENT OF INTENT**

3.1 The CCTV systems will be registered with the Information Commissioner (ICO) under the terms of the Data Protection Act 2018 and will seek to comply with the requirements both of the Data Protection Act and the Commissioners Code of Practice.

3.2 The systems, information, documentation and recordings obtained, will be treated in accordance with the Data Protection Act.

3.3 Cameras will be used to monitor activities within the school and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school, together with its visitors. The positions and areas monitored are detailed in Appendix 1 for all schools with operational CCTV.

3.4 The cameras will not focus on toilets, changing facilities, showers/wash areas, private homes, gardens and other areas of private property.

3.5 Unless an immediate response to events is required, staff must not direct cameras at

an individual, their property or a specific group of individuals, without an authorisation being obtained, as set out in the Regulation of Investigatory Power Act 2000.

- 3.6 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Copies will only be released by the Headteacher for use in the investigation of a specific crime and by written request from the police. Footage will **never** be released to the media or any other person for purposes of entertainment.
- 3.7 Warning signs are required by the Information Commissioner Code of Practice and have been placed at all access routes to areas covered by the school CCTV. The warning signs will be checked on a regular basis and any warning sign destroyed or damaged will be replaced.
- 3.8 This policy operates in conjunction with the Trust's Data Protection Policy and Privacy Notices.

#### **4. DATA PROTECTION IMPACT ASSESSMENT**

- 4.1 Prior to the installation of any new CCTV camera, or system, a data protection impact assessment (DPIA) will be conducted by the trust to ensure that the proposed installation is compliant with legislation and ICO guidance. The assessment will be approved by the DPO.
- 4.2 The trust will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of data.

#### **5. OPERATION OF THE SYSTEM**

- 5.1 The system will be administered and managed by the Headteacher in each school, in accordance with the principles and objectives expressed in the policy.
- 5.2 On a day-to-day basis the CCTV system will be operated by staff in academies with delegated authority as appropriate
- 5.3 The viewing of live CCTV images will be restricted to members of staff in academies and trust offices with explicit powers to view images, for the reasons set out above.
- 5.4 Recorded images which are stored by the CCTV system will be restricted to access by members of staff in academies and trust offices with explicit powers to view images, for the reasons set out above.
- 5.5 The CCTV system will be checked weekly by appropriate staff members in academies to ensure that it is operating effectively.
- 5.6 The CCTV system will be operated 24 hours each day, every day of the year. The CCTV

will not be monitored outside of the school day.

- 5.7 If the need for maintenance arises appropriate staff members must be satisfied of the identity and purpose of contractors before allowing access.

## 6. DEFINITIONS

- 6.1 For the purpose of this policy a set of definitions will be outlined, in accordance with the surveillance code of conduct:
- **Surveillance** – monitoring the movements and behaviour of individuals; this can include video, audio or live footage. For the purpose of this policy only video and audio footage will be applicable.
  - **Overt surveillance** – any use of surveillance for which authority does not fall under the Regulation of Investigatory Powers Act 2000.
  - **Covert surveillance** – any use of surveillance which is intentionally not shared with the subjects it is recording. Subjects will not be informed of such surveillance.

## 7. MONITORING PROCEDURES

- 7.1 Camera surveillance may be maintained at all times.
- 7.2 A monitor is installed in dedicated areas to which pictures will be continuously recorded.
- 7.3 Covert surveillance will only be granted when authorised by the Headteacher and in consultation with a member of the Trust management team and it must be used in accordance with the aims and objectives of the policy.
- 7.4 The Trust does not condone the use of covert surveillance when monitoring the school's staff, pupils and/or volunteers. Covert surveillance will only be operable in extreme circumstances.
- 7.5 Any overt surveillance footage will be clearly signposted around the school.

## 8. STORAGE AND RETENTION OF CCTV IMAGES

- 8.1 Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.
- 8.2 Recorded images should only be stored for a period of fourteen days unless there is a specific reason why they are retained for a longer period.

8.3 The Trust will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place will include:

- CCTV recording systems being in restricted access areas.
- CCTV systems being encrypted/password protected.
- Restriction of the ability to make copies to specified members of staff.

8.4 A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, should be maintained within each academy.

## **9. SECURITY COMPANIES**

9.1 In some academies the CCTV system is controlled by a security company contracted by the Academy.

9.2 The Academy has a written contract with the security company in place which details the areas to be monitored, how long data is to be stored, what the company may do with the data, what security standards should be in place and what verification procedures apply.

9.3 Security companies that place and operate cameras on behalf of clients are considered to be 'Data Processors'. As data processors, they operate under the instruction of data controllers. Data protection legislation places a number of obligations on data processors. These include having appropriate security measures in place to prevent unauthorised access to, or unauthorised alteration, disclosure or destruction of, the data, in particular where the processing involves the transmission of data over a network, and against all unlawful forms of processing.

## **10. DISCLOSURE OF IMAGES TO DATA SUBJECTS**

10.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation and has a right to request access to those images.

10.2 Any individual who requests access to images of themselves will be considered to have made a subject access request in accordance with the Data Protection Legislation. Such a request should be considered in the context of the Trust's Data Protection Policy.

10.3 When such a request is made the appropriately nominated representative will review the CCTV footage in accordance with the request.

- 10.4 If the individual making the request is the only person in the footage, then he/she may be permitted to view it. The viewing must be strictly limited to the specific footage which contains only images of the individual making the request. The nominated representative must take appropriate measures to ensure that the footage is restricted in this way.
- 10.5 If the footage contains images of other individuals, then the trust will consider whether:
- the images can be distorted so as not to identify the other individuals.
  - the other individuals in the footage have consented to the disclosure of the images.

If neither is possible, the trust will consider whether it is otherwise reasonable in the circumstances to disclose the images to the individual making the request.

- 10.6 A record must be kept, and held securely, of all requests for disclosures which sets out:
- When the request was made.
  - The process followed by the nominated person in determining whether the images contained images of third parties.
  - The considerations as to whether to allow access to those images.
  - The names of the individuals who were permitted to view the images and when.
  - Whether a copy of the images were provided, and if so to whom, when and in what format.

## **11.DISCLOSURE OF IMAGES TO THIRD PARTIES**

- 11.1 The Trust will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.
- 11.2 If a request is received from a law enforcement agency for disclosure of CCTV images the nominated person must follow the same process as the one for subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third-party images. A record must be kept of any disclosure of CCTV images made to third parties.

11.3 If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However, very careful consideration must be given to exactly what the Court order requires. If there are any doubts as to disclosure, then the Trust's Data Protection Officer should be contacted in the first instance and appropriate legal advice may be sought.

## **12. BREACHES OF THE POLICY**

12.1 Any breach of the policy by school staff will be initially investigated by the Headteacher, in order for them to take the appropriate disciplinary action.

12.2 Any serious breach of the policy will be immediately investigated, and an independent investigation carried out to make recommendations on how to remedy the breach.

## **13. COMPLAINTS RELATING TO THIS POLICY**

13.1 Complaints concerning the Trust's use of its CCTV systems or the disclosure of CCTV images should be made to the DPO.

## **APPENDIX 1 – CCTV Locations as of September 2024 (this list will be updated as and when the policy is due for review)**

### **Alban Wood Primary School & Nursery CCTV Locations**

1. Left hand side of the main entrance
2. Right hand side of the main school entrance
3. Boiler room pathway
4. KS2 playground
5. Lower garden
6. Upper garden
7. Nursery play area
8. Back of nursery
9. Reception playground
10. KS1 playground

### **Bromet Primary School CCTV Locations**

1. School reception
2. Main school entrance
3. To the right of the main reception entrance monitoring the car park
4. Main gates

### **Meryfield Primary School CCTV Locations**

1. Main entrance doorway
2. Driveway path
3. Staff room pathway
4. Near Year 4-6 entrances
5. KS2 playground
6. Near Year 5 entrances
7. Outside Yellow nursery

### **Oxhey Wood CCTV Locations**

1. KS1 playground x 2
2. Front car park x 2
3. KS2 playground
4. In the courtyard outside the staff room
5. Outside the assembly hall
6. Outside the year 3 and 4 area
7. Outside of the family centre
8. Inside the main entrance
9. Inside the nursery entrance
10. Inside the reception entrance
11. Inside the family centre entrance



12. Inside years 3-4 entrance
13. Inside year 5 entrance

#### **Warren Dell Primary School CCTV Locations**

1. Main school entrance
2. Nursery outdoor area
3. Pod area
4. Infant playground
5. Breakfast / after school club
6. School back gate
7. Library

#### **Wilbury Junior School CCTV Locations**

1. Front reception right side
2. Front reception left side
3. Main car park
4. Years 5/6 playground
5. At the end of the year 6 building
6. At the back of the year 6 building
7. At the back of the year 6 building
8. At the back of the year 6 building
9. At the fire exit by main reception
10. Back of the building by year 5 classrooms
- 11-15. around the two-storey building
16. Years 3-4 playground
17. Back car park
- 18-19. Driveway into school