



Kingston Educational Trust

CCTV POLICY

February 2023

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1. Introduction and Statement of Intent

This policy aims to set out the trust's approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on school property.

The purpose of the CCTV system is to:

- Make members of the school community feel safe;
- Protect members of the school community from harm to themselves or to their property;
- Deter criminality in the school;
- To support behaviour management;
- Protect school assets and buildings;
- Assist police to deter and detect crime;
- Determine the cause of accidents;
- Where appropriate, assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings;
- To assist in the defense of any litigation proceedings

The CCTV system will not be used to:

- Encroach on an individual's right to privacy
- Monitor people in spaces where they have a heightened expectation of privacy (including toilets and changing rooms);
- Follow particular individuals, unless there is an ongoing emergency incident occurring;
- Pursue any other purposes than the ones stated above.

The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

This policy is based on the Information Commissioner's Office (ICO) [guidance for the use of CCTV](#), the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR). We aim to ensure that closed circuit television (CCTV) is used responsibly and safeguards both trust and confidence in its continued use.

The schools' CCTV systems are registered with the ICO and we treat the system and all information and recordings obtained and used as data which are protected by the Data Protection Act.

2. Operation of the CCTV System

- 2.1. The CCTV system comprises a number of external (and at The Kingston Academy only internal cameras) which do not currently have sound recording capability.
- 2.2. The CCTV is operational 24 hours a day, 365 days a year. Recordings have date and time stamps.
- 2.3. The CCTV system is owned by the Trust and operation of the system is overseen by the Head teacher at each school, in accordance with the principles and objectives outlined in this policy. The Head teacher will:
 - liaise with the trust's data protection officer (DPO) to ensure that the use of the CCTV system is in accordance with the stated aims and that its use is needed and justified;
 - ensure that the guidance set out in this policy is followed by all staff;

- sign off on any expansion or upgrading to the CCTV system, after having taken advice from the DPO and taken into account the result of a data protection impact assessment completed with the DPO.

- 2.4. The day to day operation of the system has been delegated to the Facilities/Site Manager.
- 2.5. All operators of the CCTV system must be aware of their responsibilities under the ICO's ([ICO guidance for the use of CCTV](#)) and all staff must be aware of the restrictions in relation to access to, and disclosure of, recorded images.

3. Location of the Cameras

- 3.1. Cameras are sited so they only capture images relevant to the purposes for which they are installed (described in section 1 above) and care will be taken to ensure that reasonable privacy expectations are not violated. The trust/schools do not use the systems for covert monitoring.
- 3.2. The location of equipment will be carefully considered to ensure that images captured comply with the Data Protection Act 2018. Cameras are not aimed off school grounds into public spaces or people's private property.
- 3.3. Every effort will be made to position cameras so that their coverage is restricted to the schools' sites.
- 3.4. Wherever cameras are installed appropriate signage is in place to warn members of the school community that they are under surveillance.
- 3.5. Cameras are positioned in order to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

4. Storage and Retention of CCTV images

- 4.1. Recorded data will not be kept for longer than is necessary. 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. Retained data will be stored securely.
- 4.2. Recorded data is currently stored in the system for between 20 and 31 days and then automatically deleted.
- 4.3. All data that is downloaded from the system, for example for the purpose of an investigation, will be stored securely and a CCTV Retention Log kept (See Appendix B) recording what has been retained, the purpose and for how long it will be retained and where it is stored, this includes any CCTV data that the Police may require to be retained for possible use as evidence.

5. Access to CCTV images

- 5.1. Access to recorded images will be restricted to those members of staff authorised to view them and (where there is a lawful basis and at the discretion of the Head teacher) outside agencies such as the Police, and will not be made more widely available.

- 5.2. Access will only be given to authorised persons, for the purpose of pursuing the aims stated in section 1, or if there is a lawful reason to access the footage.
- 5.3. Visual display monitors/devices will be positioned so only authorised personnel will be able to see the footage.
- 5.4. All access to the system is recorded in the CCTV Viewing Log (See Appendix A), including: name of viewer and other persons present, date and time of recording and date and time of viewing, purpose of viewing and outcome. Live feed or recordings from the CCTV systems will only be viewed in designated locations, with only authorised staff present.
- 5.5. The following members of staff have authorisation to access the CCTV footage:

- The Head teacher
- Members of the Senior Leadership Team
- The Data Protection Officer
- The Site/Facilities Manager
- Anyone with express permission of the Head teacher

Any member of staff who misuses the surveillance system may be committing a criminal offence, and may face disciplinary action.

6. Subject Access Requests

- 6.1. Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act and UK GDPR
- 6.2. All requests should be directed to the Head teacher and copied to the Data Protection Officer who can be contacted by email: dataprotection@kingstoneducationaltrust.org all Subject Access Requests are logged.
- 6.3. 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.
- 6.4. The school will respond as soon as possible and within a calendar month of receiving the request. Access to CCTV footage will be refused where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation, or where other legal exemptions apply. The Head teacher will decide, in consultation with the DPO, whether to comply with the request or whether an exemption will apply.

7. Access to and disclosure of images to third parties

- 7.1. There will be no disclosure of recorded data to third parties other than as may be permitted by data protection law.
- 7.2. Footage will only ever be shared with authorised personnel such as law enforcement agencies or other service providers who reasonably need access to the footage (e.g. investigators). The Head teacher will decide, in consultation with the DPO, whether to comply with the request.
- 7.3. Requests should be made in writing to the Head teacher and copied to the Data Protection Officer who can be contacted by email: dataprotection@kingstoneducationaltrust.org.

- 7.4. 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.
- 7.5. All disclosures will be recorded by the DPO.

8. Data Protection Impact Assessments (DPIA) and Privacy by Design

- 8.1. The trust and its schools follow the principle of privacy by design. Privacy is taken into account during every stage of the deployment of the CCTV system, including the replacement, development and upgrading.
- 8.2. The system is used only for the purpose of fulfilling its aims (stated in section 1).
- 8.3. When the CCTV system is replaced, developed or upgraded, (including if cameras are moved or additional cameras installed) a DPIA will be carried out to be sure the aim of the system is still justifiable, necessary and proportionate.
- 8.4. The DPO will provide guidance on how to carry out the DPIA.
- 8.5. If any security risks are identified in the course of the DPIA, the school will address them as soon as possible.

9. Complaints

Complaints and enquiries about the operation of the CCTV system should be directed to the Head teacher or to the Data Protection Officer in the first instance and will be dealt with in accordance with the trust's Complaints Policy (a copy can be found on the policy page of the schools' websites).

10. Breaches

Any personal data protection breach relating to the CCTV system or recordings, must immediately be reported to the Data Protection Officer and will be dealt with in accordance with the breach provisions in the separate Data Protection Policy (a copy is available from the [Policy page](#) on the school website or in the Policy Folder in the Whole School Shared Drive).

11. Policy review and monitoring arrangements

- 11.1. The Data Protection Officer is responsible for monitoring and reviewing this policy every two years with the Head teacher.
- 11.2. The next review is due in **February 2025**.

Approved by Kingston Educational Trust Board

Date: 27 March 2023

Appendix A: CCTV Viewing Log

Date and time of recording	Name of viewer and any others present	Date and time viewed	Purpose of Viewing (include a brief description of images)	Outcome	Copy retained Y/N (if yes Retention Log to be completed)

Appendix B: CCTV Retention Log

Date of retention	Date and time of recording (and any image/file reference)	Retention authorised by	Reason for retention (include a brief description of images)	Format stored in and location	Period to be retained	Date deleted, by whom and reason