



CCTV Policy  
St John's Primary Academy

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## 2. Version control

Date	Version	Revision	Owner
16/01/19	1.0	New Policy Document	Future Generation Trust Policy Team
05/06/20	2.0	Policy updated due to installation of new CCTV Security System	St John's Primary Academy Senior Leadership Team
07/05/21	3.0	Policy updated to include additional camera	St John's Primary Academy Senior Leadership Team
11/11/2022	4.0	Scheduled review of policy	St John's Primary Academy Senior Leadership Team

### **3. Policy Statement**

Future Generation Trust uses Close Circuit Television (“CCTV”) within the premises of St John’s Primary Academy. The purpose of this policy is to set out the position of the Trust as to the management, operation and use of the CCTV at the academy.

This policy applies to all members of our workforce, visitors to the academy premises and all other persons whose images may be captured by the CCTV system.

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

- The UK General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998

This policy sets out the position of Future Generation Trust in relation to its use of CCTV.

### **4. Purpose of CCTV**

Future Generation Trust uses CCTV for the following purposes:

- To provide a safe and secure environment for pupils, staff and visitors.
- To prevent the loss of or damage to the Trust’s buildings and/or assets.
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.

### **5. Description of system**

The system at St John’s Primary Academy was installed by Connaught in June 2020 and consists of:

- 14 external HD cameras (1 additional camera was installed in May 2021)
- 1 internal HD camera with built in microphone
- 6TB surveillance hard disk drive

### **6. Siting of Cameras**

All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.

Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. Furthermore, the company installing the CCTV system is required to ensure that the privacy of any areas, within the range of the cameras, is not compromised.

Signs will be erected to inform individuals that they are in an area within which CCTV is in operation. Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.

## **7. CCTV Privacy Impact Assessment**

Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by the academy to ensure that the proposed installation is compliant with legislation and ICO guidance.

The Academy 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 personal data.

## **8. Management and Access**

The CCTV system will be managed by the Learning Technologies Manager.

On a day to day basis the CCTV system will be operated by Academy Office staff, the Site Supervisor, and the Learning Technologies Manager.

The viewing of live CCTV images will be restricted to senior management, Academy Office staff, the Site Supervisor and the Learning Technologies Manager. There must be justification for why any such individuals require the ability to view footage.

The viewing of live CCTV images via remote access will be restricted to the Headteacher, the Site Supervisor and the Learning Technologies Manager. Connaught will also have remote access for the purpose of maintenance and support.

Recorded images which are stored by the CCTV system will be restricted to access by senior management, the Site Supervisor and the Learning Technologies Manager.

No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.

A service contract is in place with Connaught for maintenance and remote support to ensure that the CCTV system it is operating effectively.

## **9. Storage and Retention of Images**

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.

Recorded images are stored only for a period of one calendar month unless there is a specific purpose for which they are retained for a longer period.

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

- CCTV recording systems and monitors being located in restricted access areas
- The CCTV system being encrypted/password protected
- Restriction of the ability to make copies to specified members of staff

A log of any access to the CCTV images relating to specific incidents, including time and dates of access, and a record of the individual accessing the images, will be maintained by the Academy.

Unless the CCTV records a specific incident then recorded images will not be retained for more than one calendar month.

## 10. Disclosure of Images to Data Subjects

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.

Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the Trust's **Subject Access Request Procedure**.

When such a request is made the named individual with access to the CCTV system will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The named individual with access to the CCTV system must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals then the academy 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.

A record must be kept, and held securely, of all disclosures which sets out:

- When the request was made
- The process followed by the named individual with access to the CCTV system in determining whether the images contained third parties
- The considerations as to whether to allow access to those images
- The individuals that were permitted to view the images and when
- Whether a copy of the images was provided, and if so to whom, when and in what format

## 11. Disclosure of Images to Third Parties

The Academy will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

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

If a request is received from a law enforcement agency for disclosure of CCTV images then the named individual with access to the CCTV system must follow the same process as above in relation to subject access requests. Details should be obtained from the law enforcement agency as to

exactly what they want the CCTV images for, and any particular 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.

The information above must be recorded in relation to any disclosure.

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 concerns as to disclosure then the Trust's Data Protection Officer (DPO) should be contacted in the first instance and appropriate legal advice may be required.

Our DPO is Stuart Ayres (Chief Executive Officer), and they can be contacted at Future Generation Trust Office, St John's Primary Academy, Hobnock Road, Essington, Wolverhampton, WV11 2RF. (Tel: 01922 496570, or e-mail: office@futuregenerationtrust.co.uk)

## **12. Review of Policy and CCTV**

The Future Generation Trust Board has overall responsibility for this policy and for reviewing its implementation and effectiveness. The Headteacher has day-to-day operational responsibility for this policy at their academy and must ensure that staff are fully aware of its contents and trained accordingly.

This policy and all arrangements and procedures will be reviewed on a two-year cycle or sooner should there be any changes to how the system is operated or if any additional cameras are to be installed.

The CCTV system and the privacy impact assessment relating to it will also be reviewed on a two-year cycle (or sooner if required). This is to ensure that the use of any CCTV system continues to be justified and is compliant with legal requirements. Each academy must ensure that it has procedures in place to ensure that the CCTV system is regularly reviewed

## **13. Misuse of CCTV systems**

The misuse of a CCTV system could constitute a criminal offence.

Any member of staff who breaches this policy may be subject to disciplinary action.

## **14. Complaints relating to this policy**

Any complaints relating to this policy or to the CCTV system operated at St John's Primary Academy should be made in accordance with the Trust's **Complaints Policy & Procedure**.

**Policy adopted on:** 8 December  
2022

**Review Date:**

December  
2024

**Signed:** Rob Grinsted

**Designation:** Chair of Governors