



Slough and East Berkshire
C of E Multi Academy Trust

Closed Circuit Television (CCTV) Policy

(Trust Governors include Members, Directors/Trustees and Governors of Local Governing Bodies)

Category:	Discretionary
Owner:	SEBMAT Directors and Local Governing Bodies
Ratified by Trustees/Directors	May 2023 Signature: <i>Chames</i>
Date Policy to be reviewed (bi-annually)	April 2025

SEBMAT Closed Circuit Television (CCTV) Policy

This policy will be reviewed bi-annually.

Date of next review: April 2025

Introduction

Closed Circuit Television (CCTV) systems where they are installed on SEBMAT sites are overseen by IT Support on behalf of the Headteacher, with the aim to help protect staff, students, visitors and property on the school site. Overall responsibility for the CCTV system lies with the IT Director for functional issues, and the School Business\Operations Manager for coverage and change management at site level.

The CCTV system will be regularly maintained and improved to ensure a wide coverage of the school to ensure that if an incident were to arise sufficient CCTV footage would be available to lead to a positive outcome.

The CCTV Policy will be available to all staff, students, parents and visitors to the school via the school's website and intranet. This policy describes the purpose and location of CCTV monitoring, a contact number for those wishing to discuss CCTV monitoring and guidelines for its use.

1. Purpose of this policy

CCTV systems are installed (both internally and externally) for the purpose of enhancing security of the building, its occupants and its associated equipment.

CCTV surveillance across the Trust is intended for the purposes of:

- protecting the school buildings and school assets, both during and after school hours.
- promoting the health and safety of staff, pupils and visitors.
- preventing bullying.
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
- assisting in identifying, apprehending and prosecuting offenders; and
- ensuring that the school rules are respected so that the school can be properly managed.

2. Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. Coverage in such areas is facilitated only to ensure the safety and security of staff and students in environments deemed to be of higher risk to safety or those demanding surveillance for safeguarding purposes. We will ensure that CCTV systems, where installed, are operated only in a way that is compatible with the provisions of this policy.

3. General principles

SEBMAT, as an established institution, has a statutory responsibility for the protection of its property and equipment as well providing a sense of security to its employees, students and visitors to its premises. The Trust owes a duty of care under the provisions of the Health and Safety at Work etc. Act 1974 and associated legislation and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life of the school community. The operation of the CCTV system will be conducted in a professional, ethical and legal manner and any use of CCTV security technologies for other purposes is prohibited by this policy e.g., CCTV will not be used for monitoring employee performance.

Members of Senior Leadership Teams (SLT), Heads of Year, members of the Safeguarding team, and the Estates team have direct access to the CCTV system. Any other staff member may request, and review information obtained through the CCTV system under the authority of the Headteacher. Any request for CCTV recordings must be documented in the CCTV log to show who requested the footage, the nature and

approximate time and date of the footage, who recovered the recordings and when they were recovered. (See "Access" below). The CCTV log will be accessible on the individual school's intranet\Office 365 tenant. If a law enforcement authority seeks a recording for a specific investigation, they may require a warrant. Any such request made should be requested in writing and the school may seek legal advice. Only the SLT and IT Support are able to export CCTV recordings and/or screenshots for later viewing. Use of such recordings is authorised by the Headteacher for use in parent meetings or, for example, exclusion meetings or Governor meetings, and any other situation that the Headteacher feels appropriate within the bounds of this policy.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school and the provisions set down in equality, educational, and other associated legislation.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g., race, gender, sexual orientation, national origin, disability etc.

Video monitoring of public areas for security purposes within the school premises is limited to uses that do not violate the individual's reasonable expectation of privacy.

There is no cross-site access to other schools CCTV systems, and they are all specific to the site they are installed at.

4. Justification for use of CCTV

The General Data Protection Regulations require that all data collected is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that each school needs to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV to monitor the perimeter of the school buildings for security purposes is a justified reason to help to capture images of intruders or of individuals damaging property or removing goods without authorisation and is covered under Section 6 of the UK GDPR as 'legitimate interests'.

CCTV systems will not be used to monitor normal teacher/student classroom activity in school, and no audio capabilities are used or enabled.

In other areas of the school where CCTV has been installed (e.g., hallways, stairwells and communal areas), it has been demonstrated that the installation of CCTV is proportionate in addressing such issues that have posed a risk to security and/or health & safety.

5. Justification of camera locations

The location of cameras is a key consideration. Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. Each school has endeavoured to select locations for the installation of CCTV cameras which provide clear images and adequate coverage of the site while not intruding on the privacy of individuals. Cameras are placed so as to record external/communal areas and are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

CCTV Video Monitoring and Recording of Public Areas may include the following:

- **Protection of school buildings and property:** The buildings' perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services.
- **Protection of Staff, Students and Visitors:** External and internal locations within the school grounds
- **Monitoring of Access Control Systems:** Monitor and record restricted access areas at entrances to buildings and other areas.
- **Verification of Security Alarms:** Intrusion alarms, exit door controls, external alarms.
- **Video Patrol of Public Areas:** Parking areas, Main entrance/exit gates, traffic Control
- **Criminal Investigations (carried out by the police):** Robbery, burglary and theft surveillance.

6. Covert surveillance

No schools in the Trust will engage in covert surveillance.

Where the police request to carry out covert surveillance on school premises, such covert surveillance may require the consent of a judge. Any such request made by the police will be requested in writing and the school may seek legal advice.

7. Notification (Signage)

Adequate signage will be installed at key locations to indicate that CCTV is in operation. Adequate signage will also be prominently displayed at the entrance to the school.

Appropriate locations for signage will include but are not limited to, entrances to the premises (external doors and school gates), reception areas and hallways.

8. Storage and Retention

The General Data Protection Regulations state that data "shall not be kept for longer than is necessary" for the purposes for which it was obtained. The images captured by the CCTV system will be retained for a maximum of 42 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue. The images/recordings will be stored in a secure environment with a log of access kept. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis. No physical copies of these recordings will be made unless requested by a law enforcement body.

9. Access requests

All subject access requests will be managed in accordance with our data protection policy.

10. Live Feeds

In some areas we use live feeds of CCTV to assist staff and act as a deterrent, these will be for key areas identified as being areas of higher risk where immediate action may be required.

11. Responsibilities

The school(s) will:

- Ensure that CCTV systems are operated in accordance with this policy.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the school.
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy.
- Ensure that the CCTV monitoring at all sites is consistent with the highest standards and protections and adheres to the ICO's Code of Practice for the use of CCTV.
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.
- Maintain a record of access (e.g., an access log) for the release of any material recorded or stored in the system.
- Ensure that recorded footage is not duplicated for unjustified or unwarranted release.
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement should take place.
- Ensure adequate signage at appropriate and prominent locations is displayed as detailed above.
- Ensure that external cameras are not intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy".

- Ensure that recordings are stored in a secure place with access permissions for by authorised personnel only.
- Ensure that there is no unwarranted invasion of privacy, and staff only use zoom to confirm identities or actions as and when appropriate.
- Ensure that camera control is solely to promote safeguarding and security, including monitoring suspicious behaviour, criminal damage etc. and not to monitor individuals.
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.
- Review the Data Protection Impact Assessment for CCTV when and if changes are made to either the system or the guidelines in UK GDPR, **or after a minimum of two years.**