

Girls' Learning Trust
Closed Circuit TV (CCTV) Policy

Approval: Executive Leadership Group
Date: 24 May 2023
Review: Annual Review

1. INTRODUCTION

- 1.1 The Girls' Learning Trust uses closed circuit television (CCTV) images in order to provide a safe and secure environment for students, staff and visitors, to reduce crime, and to prevent loss or damage to property.
- 1.2 The CCTV system comprises a number of fixed cameras, with the capability to record both sound and images.
- 1.3 The CCTV system is owned and operated by the Trust on behalf of each school. The responsibility for the deployment and management of which is jointly owned by the relevant Headteacher and the Trust's Chief Operating Officer. The introduction of, or changes to, CCTV monitoring will be subject to appropriate consultation with staff and the school community.
- 1.4 The Trust's CCTV Scheme is registered with the Information Commissioner's Office (ICO) under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings is covered by the General Data Protection Regulation 2016 (the GDPR) and the Data Protection Act 2018. This policy outlines the school's use of CCTV and how it complies with the data protection legislation.
- 1.5 All authorised operators, and employees with access to images, must be aware of the procedures that need to be followed when accessing the recorded images and sound. All operators must be trained in their responsibilities under the CCTV Code of Practice. All employees must be aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

2. STATEMENT OF INTENT

- 2.1 The Trust complies with the ICO CCTV Code of Practice, to ensure it is used responsibly and safeguards both trust and confidence in its continued use. All authorised operators must sign to agree they have understood this Code.
- 2.2 CCTV warning signs should be clearly and prominently placed in all areas where CCTV is used. Schools should ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.
- 2.3 The planning and design of the camera placement is intended to ensure that the CCTV Scheme will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.
- 2.4 CCTV surveillance in schools is intended for the purposes of:
 - Protecting school buildings and other assets, both during and after school hours
 - Promoting the health and safety of staff, students and visitors

- Preventing bullying and in support of general safeguarding measures
- 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
- Ensuring that school rules are respected, so that the schools can be properly managed.

3. THE DATA PROTECTION OFFICER (DPO)

The Trust Board shall appoint a designated Data Protection Officer. The role and responsibilities of the Data Protection Officer (DPO) include:

- Dealing with subject access requests (SAR) in line with legislation, for any disclosure of CCTV footage held by the Trust.
- Ensuring that all identified staff at each school within the Trust handle and process surveillance and CCTV footage in accordance with data protection legislation.
- Ensuring that surveillance and CCTV footage is obtained in line with legal requirements.
- Ensuring that surveillance and CCTV footage is destroyed in line with legal requirements when it falls outside of its retention period.
- Informing data subjects of how their data captured in surveillance and CCTV footage will be used by the Trust, their rights for the data to be destroyed and the measures implemented by the school to protect individuals' personal information.
- Ensuring each school in the Trust has completed a privacy impact assessment (PIA), and a data protection impact assessment (DPIA), to ensure the use of surveillance and CCTV is justified and monitors the risks of using such systems.
- Ensuring that all relevant staff in the Trust understand their responsibilities as set out in the ICO CCTV Codes of Practice.

4. THE HEADTEACHER AND LEAD PERSON

4.1 In each school, the Headteacher is responsible for identifying and appointing a Lead Person (who may be the Headteacher) to lead the management and supervision of CCTV in the school. This individual must be approved by the Trust's Data Protection Officer.

4.2 The role and responsibilities of the Lead Person in each school include:

- Ensuring that this this policy is followed by all staff and pupils in the school.
- Arranging training for relevant school staff in consultation with the Trust DPO.
- Identifying staff within the school who will be responsible for the operation and viewing of the CCTV system (who will usually include the relevant Premises Manager and Designated Safeguarding Lead).

5. THE CHIEF OPERATING OFFICER

5.1 The Chief Operating Officer of the Trust is responsible for the overall management of the CCTV infrastructure including:

- The installation, maintenance and upkeep of all hardware.
- The installation and management of all relevant software.
- Ensuring adequate resources are in place within the school to use the CCTV system appropriately.

6. LOCATION OF CAMERAS

- 6.1 Cameras are sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The Trust will ensure that the location of equipment is carefully considered to ensure that images captured comply with the GDPR and the Data Protection Act 2018.
- 6.2 The Trust will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.
- 6.3 CCTV will not generally be used in classrooms, but in areas within the school that have been identified as not being easily monitored. If CCTV is placed in classrooms, A DPIA would be completed; this must be approved by the DPO and relevant Headteacher, and parents must be consulted in advance.
- 6.4 Members of staff should have access to details of where CCTV cameras are situated.
- 6.5 The Premises and IT teams in each school are jointly responsible for the upkeep and maintenance of cameras.

7. STORAGE AND RETENTION OF CCTV IMAGES

- 7.1 Recorded data will not be retained for longer than is necessary, in keeping with the Trust's Records Retention Policy. 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.
- 7.2 The Headteacher and Lead Person (if not the Headteacher) in each school are responsible for identifying those permitted to download, store and/or retain CCTV images and/or sound files.
- 7.3 All retained data must be stored securely, with arrangements approved by the Trust DPO.

8. ACCESS TO CCTV IMAGES

- 8.1 The Headteacher and Lead Person in each school are responsible for identifying those permitted to access CCTV images on screen.
- 8.2 A log of any access to view the CCTV recordings will be maintained by the Lead Person in each school, and must include the time and date of access, the name of the authorised person accessing the recordings and the reason for accessing the information. A template for this is provided in Appendix One.
- 8.3 Sharing of CCTV sound and images will be subject to the General Data Protection Regulation 2016 (the GDPR) and the Data Protection Act 2018. All requests for third party access to CCTV data must be addressed to the Data Protection Officer.

9. SUBJECT ACCESS REQUESTS (SAR)

- 9.1 Individuals have the right to request access to CCTV footage relating to themselves under the GDPR and the Data Protection Act 2018. Any individual who requests access to images of themselves will be considered to have made a Subject Access Request.

9.2 When a request is made, the Data Protection Officer must be informed. The DPO will then work with the Lead Person in the relevant school to ensure the Trust's SAR Guidance is followed.

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

- When the request was received.
- The considerations as to whether to allow access to those images.
- The individuals who were permitted to view the images, recording the date and time.
- Whether a copy of the images was provided, if so to whom and the format of the information.

10. COMPLAINTS

Complaints and enquiries about the operation of CCTV within the school should be directed in the first instance to the Headteacher, who will consult with the Data Protection Officer, and act in accordance with the Trust Complaints Policy and Procedures.

May 2023

Jennifer Smith (Chief Executive Officer)

Dr Tom Flynn (Chief Operating Officer)

Pete Creaser (GLT Head of IT)

