CCTV Policy and Procedures

Policy Details	
Policy Title:	CCTV Policy and Procedures
Last amendment date:	July 2025
Owner:	Director of Governance & Compliance
Approved by:	Senior Directors Meeting
Next review date:	July 2026

Rationale

The purpose of this policy is to set out the school's approach to the operation, management and usage of closed circuit television (CCTV) systems at each of the school sites within the Haberdashers' Academies Trust South (The Trust).

The Trust's CCTV systems have been put in place in order to:

- monitor activities within the school, its car parks and other public areas to identify criminal activity and poor behaviour occurring, anticipated, or perceived;
- ensure the welfare and safety of students, staff and visitors at each of the schools;
- protect The Trust's buildings and their assets from theft and vandalism.
- assist in identifying any person who is breaking the law or any incidences in which any of the Trust or school's policies are breached.

This policy is drafted in compliance with the Data Protection Act 2018. The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

Scope

The intended scope of this policy is for the entire Haberdashers' Academies Trust South.

Implementation

Statement of Intent

The Trust Data Protection Officer is the person responsible for putting in place policies and procedures to ensure the system's compliance with the relevant legislation. All persons designing, implementing or operating The Trust's CCTV systems must comply with this policy.

The Trust follows the Information Commissioner's Office (ICO) guidance for the use of CCTV, and complies with data protection principles. The Trust treats the CCTV system and all information, documents and recordings obtained and used in relation to it as personal data and will apply the same rules to its processing as it does with any other personal data that it collects.

Cameras are used to monitor activities within the Trust's schools, car parks, playing fields and playgrounds and other public areas to identify criminal activity occurring, anticipated, or perceived, and for the purpose of ensuring the welfare and safety of students, staff and visitors at each of the schools. However, there is no guarantee that all incidents will be captured by these cameras. The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

Static cameras will not be focused on private homes, gardens and other areas of private property. Cameras will not be directed at an individual, their property or a specific group of individuals. Where this is not possible, digital masking will be used.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Footage will only be released for use in the investigation of a specific crime or incident by the request of the police or by the request of the Principal or a senior leader with delegated authority. Recordings may be used when Trust policies are breached and may be used as evidence of such in associated internal hearings. The system will not be used to track or monitor any specific individuals at any time. Footage will never be released to the media for purposes of entertainment.

Responsibilities

CCTV Scheme Manager – The Trust Data Protection Officer

The CCTV scheme manager is the Trust Data Protection Officer for Haberdashers' Academies Trust South. The CCTV scheme manager is responsible for ensuring that an appropriate policy is in place for setting out the Trust's approach to operation, management and use of CCTV systems. That is this policy. The Trust Data Protection Officer acts as the Trust's point of contact with the ICO, and supports school Data Protection Leads by offering data protection training and guidance, facilitating the provision of necessary information concerning data protection legislation, Privacy Impact Assessments, and data access requests.

CCTV Managers –Principals of each school

The CCTV managers are the Principals in each of the schools and are responsible for the leadership and management of the school CCTV system. They may delegate a senior leader to carry out some of these functions on their behalf. They are responsible for:

- deciding where cameras are positioned and which areas of the school are under CCTV surveillance or not, liaising with the Trust Data Protection Officer to ensure that the CCTV system is in accordance with this policy's stated aims, its use is needed and justified and that footage is obtained in a legal, fair and transparent manner.
- reviewing requests to view footage and deciding on their approval or rejection.
- Ensuring those persons with authorisation to access the CCTV system and footage have received sufficient training from the Data Protection Lead or Trust Data Protection Officer in the use of the system and in data protection.
- instructing the CCTV operators to make footage available to other staff and the police.
- ensuring that CCTV data is stored, secured and destroyed in line with the Trust's policies and procedures in these areas.

The CCTV managers are responsible for ensuring that the Trust's data protection policies are followed with regards to the personal data that is collected from the CCTV system, including the completion of Privacy Impact Assessments if the CCTV system is replaced, developed or upgraded, for communicating the content of this policy to all employees, and for ensuring that no personal rights are breached by the recording, viewing of sharing of CCTV footage.

CCTV Operators – School IT Teams & Facilities Teams

The CCTV operators within each school site are the IT teams. The CCTV operators are aware that CCTV footage will only be viewed in specific cases, only by approval of the school's CCTV manager (i.e. the Principal or someone to whom the Principal has specifically delegated that authority), and only for one of the reasons outlined in the aims section of this document. CCTV operators will not make any footage available without approval from the CCTV manager first. CCTV operators are responsible for keeping a viewing log for footage which needs to be on the IT helpdesk.

CCTV operators are responsible for the clear placement of signs in areas that are monitored by CCTV and ensuring that they contain the required information and are of an appropriate size.

CCTV operators are responsible for the maintenance of the CCTV system; including regularly checking that the system is working properly and the image is of the right quality, upgrades and fixing damaged or broken cameras or devices, as well as for keeping a maintenance log for the system. If cameras are upgraded, or new cameras installed, the CCTV Operators should work with the school Data Protection Lead on the completion of a Privacy Impact Assessment. This may include consultation with the school community and neighboring residents if necessary. Privacy Impact Assessments should be reviewed regularly by the CCTV Operator and Data Protection Lead, seeking advice from the Trust DPO where required. Signage in relation to CCTV surveillance.

The Trust does not need to ask individuals' permission to use CCTV but makes it clear where individuals are being recorded. Security cameras are clearly visible and signs are placed so that staff, students, visitors and the public are aware that they are entering a zone which is covered by surveillance equipment and whether this equipment records audio.

The size of signs will vary according to circumstances; for example:

- A sign on the entrance door to the school may only need to be A4 size because it is at eye level of those entering the premises.
- A sign at the entrance to the car park alerting drivers to the fact that the car park is covered by such equipment will need to be large – at least A3 size - as they are likely to be viewed from further away.

The signs will contain the following information:

a) Identity of the person or organisation responsible for the scheme.
b) The purposes of the scheme.
c) Details of whom to contact within the school regarding the scheme.

Storage, Security and Destruction

CCTV footage is stored for no longer than is necessary, in order to comply with data protection principles. At the Haberdashers' Academies Trust South, we have set the following retention periods for our CCTV footage:

a) **General CCTV footage:** footage containing no identified incidents will be kept for a maximum of 31 days and then will be wiped or overwritten.
b) **CCTV footage of an incident:** that has been identified as potential evidence of a crime or of a breach of one of the school's policies. This will be copied onto a separate, access-controlled storage, area and kept for the duration of the investigation and if required and any subsequent legal action, plus three years. It will then be removed. If the footage is of poor quality and does not clearly show the incident or those involved, the Principal will make the decision as to whether it should be retained as part of investigations. A log will be kept by the IT team of CCTV footage that has been copied from the main system, including:

i. The date on which the images were removed from the general system for use as evidence.
ii. The reason why they were removed from the system.
iii. Any crime incident number to which the images may be relevant or the in-school investigation identifier.
iv. The location of the images.
v. The name of the person who has taken over responsibility from the CCTV operator for the security and correct retention and destruction of the images.

Access to footage

Through the publication of this policy, all employees will be made aware of the restrictions set out in this policy in relation to access to, and disclosure of, recorded images.

- Access to recorded images is restricted to those staff who need to have access in order to achieve the aims of this policy and all access will be approved by the Principal or a senior leader with specific delegated authority.
- All access to the footage generated by the CCTV system will be documented by a member of the IT team at the school.
- Disclosure of the recorded images to third parties will only be made in limited circumstances and at the approval of the Principal.
- CCTV footage may be used as evidence for exclusion, suspension or other internal hearing panel if it was captured by the Trust but this should be in limited circumstances. Principals should refer to the Use of CCTV for Exclusion Panels guidance document (on Habs Hub) for how to approach the use of CCTV footage.

Any individual who appears in CCTV may, according to UK GDPR and the Data Protection Act 2018 be entitled to see that footage by making a subject access request. All Trust staff should be able to recognise a subject access request and know who to direct the request to. Information on how to do this can be found in the Data Protection Policy.

- All subject access requests for data will be managed by the school's Data Protection Lead (this is usually the Business Manager or equivalent). Data subjects will be asked to provide:
    - the information required in order to locate the images requested.
    - the information required in order to identify the person making the request.
- On occasion the school will reserve the right to refuse a SAR, if, for example, the release of the footage to the subject would prejudice an ongoing investigation.
- If access to or disclosure of the images is allowed, then the following will be documented by the school's Data Protection Lead:
    - The date and time at which access was allowed or the date on which disclosure was made.
    - The identification of any third party who was allowed access or to whom disclosure was made.
    - The reason for allowing access or disclosure.
    - The extent of the information to which access was allowed or which was disclosed and how the access or disclosure was made.
- Images that may identify other individuals should be obscured to prevent unwarranted identification. The school will attempt to conceal their identities by blurring out their faces, or redacting parts of the footage. If this is not possible the school will seek their consent before releasing the footage. If consent is not forthcoming the still images may be released.
- If access to or disclosure of the images is refused, then the following will be documented by the school's Data Protection Lead:
    - The identity of the individual making the request.
    - The date of the request.
    - The reason for refusing to supply the images requested.

- The name and signature of the Principal or designated member of staff making the decision.

Communication

All staff, including Principals and IT Teams

- **Message:** CCTV footage is personal data. There are procedures in place regarding access to footage and it cannot be given out or accessed without following this policy.
- **Where communicated:** in this policy, which is posted on the Habs Hub.
- **When communicated:** once during each academic year during a staff briefing about data protection.

Students and parents / guardians that want to request access to footage

- **Message:** CCTV footage is personal data. There are procedures in place regarding access to this and it cannot be given out or accessed without following this policy.
- **Where communicated:**
  - In this policy, which is posted on the Trust's website and details of which are sent to any parent / guardian or student who requests to view CCTV footage.
  - On the Trust's more general subject access guidance found in privacy notices.
- **When communicated:** available to view on the website and all of the above documentation supplied on request to access footage.

Complaints

Complaints regarding the implementation of this policy should be made according to the Trust's Complaints Policy, a copy of which can be found on the Trust website, and should be directed initially to the Data Protection Lead for the relevant school or to the Trust. Details for each can be found in the Data Protection Policy.

Monitoring and evaluation

Monitoring

The CCTV operators in each school are responsible for maintenance of the CCTV system and periodically checking:

- How many cameras are currently active.
- Whether any changes to the CCTV system have been made in the last year.
- Whether there are any planned changes to the system in the coming year.
- A check that all cameras are working and are positioned so as not to monitor the activity of any individual specifically.
- A check that all CCTV signage is in place in the correct locations and including the correct information.
- A check that general footage is being kept securely and is being destroyed in the correct way and in the correct timescale.

The CCTV operators in each school are responsible for recording information about access granted to CCTV footage as described in the "Access to Footage" section above.

Evaluation

- This policy will be reviewed annually.

Related documents

This policy should be read in conjunction with:

- The Data Protection Policy
- Privacy Notices