



West Norfolk
Academies Trust

CCTV POLICY

Approved By: Trustees

Approved: October 2024

Next Review: October 2025

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1. Policy Statement

- 1.1 This document sets out the appropriate actions and procedures, which must be followed to comply with the Data Protection Act 2018 and UK GDPR in respect of the use of CCTV (closed circuit television) surveillance systems managed by the West Norfolk Academies Trust.
- 1.2 We believe that CCTV and other surveillance systems have a legitimate role to play in helping to maintain a safe and secure environment for all our staff, students and visitors. However, we recognise that this may raise concerns about the effect on individuals and their privacy. This policy is intended to address such concerns. Images recorded by surveillance systems are personal data which must be processed in accordance with data protection laws. We are committed to complying with our legal obligations and ensuring that the legal rights of staff, relating to their personal data, are recognised and respected.
- 1.3 This policy is intended to assist staff in complying with their own legal obligations when working with personal data. In certain circumstances, misuse of information generated by CCTV or other surveillance systems could constitute a criminal offence.

2. About this Policy

- 2.1 We currently use CCTV cameras to view and record individuals on and around our premises. This policy outlines why we use CCTV, how we will use CCTV and how we will process data recorded by CCTV cameras to ensure we are compliant with data protection law and best practice.
- 2.2 We recognise that information that we hold about individuals is subject to data protection legislation. The images of individuals recorded by CCTV cameras in the workplace are personal data and therefore subject to the legislation. We are committed to complying with all our legal obligations and seek to comply with best practice suggestions from the Information Commissioner's Office (**ICO**).
- 2.3 This policy covers all employees, contractors, governors, trustees, volunteers and any other individuals engaged to perform services for West Norfolk Academies Trust. This policy has been supervised by the Trust Data Protection Officer (DPO) and approved by the Trustees.
- 2.4 A breach of this policy may, in appropriate circumstances, be treated as a disciplinary matter. Following investigation, a breach of this policy may be regarded as misconduct leading to disciplinary action, up to and including dismissal.
- 2.5 All authorised employees viewing CCTV images are responsible for their every viewing of the images, which must be justifiable. Any breach of the Data Protection Act 2018 will be dealt with in accordance with that legislation. All authorised employees viewing CCTV images must be aware of their liability under this act.

3. Personnel responsible

- 3.1 The board of Trustees has overall responsibility for ensuring compliance with relevant legislation and the effective operation of this policy. Day-to-day management responsibility for deciding what information is recorded, how it will be used and to whom it may be disclosed has been delegated to the Trust Chief Finance and Operations Officer. Day-to-day operational responsibility for CCTV cameras and the storage of data recorded is the responsibility of the Trust Facilities Manager.
- 3.2 This Policy will be maintained and reviewed at least annually under the supervision of the Trust DPO.

4. Purpose of the CCTV System

- 4.1 We currently use CCTV on our premises for the following reasons:
- (a) to prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime;
 - (b) for the personal safety of students, staff, visitors and other members of the public and to act as a deterrent against crime;
 - (c) to support law enforcement bodies in the prevention, detection and prosecution of crime;
 - (d) to assist in day-to-day management, including ensuring the health and safety of students, staff and others;
 - (e) to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;

This list is not exhaustive and other purposes may be or become relevant.

5. Monitoring

- 5.1 Cameras are situated to ensure they cover Trust premises as far as is possible, including the exterior of buildings, vulnerable public facing areas, car parks, outside spaces, communal areas within buildings and both the main entrance and secondary exits.
- 5.2 The CCTV system is currently in operation and capable of being monitored 24 hours a day, every day of the year.
- 5.3 As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property.
- 5.4 Prior to introducing any new surveillance system, or placing a new CCTV camera in an area where privacy might be expected, we will carefully consider if they are appropriate by carrying out a Data Protection Impact Assessment (DPIA). Any DPIA will consider the nature of the problem that we are seeking to address at that time and whether the surveillance camera is likely to be an effective solution, or whether a better solution exists. In particular, we will consider the effect a surveillance camera will have on individuals and therefore whether its use is a proportionate response to the problem identified.

6. How will we operate any CCTV

- 6.1 We will ensure that signs are displayed at the entrance of the surveillance zone to alert individuals that their image may be recorded. Such signs will contain details of which organisation is monitoring the CCTV (If not wholly operated by West Norfolk Academies Trust) and who to contact for further information, where these things are not obvious to those being monitored.
- 6.2 We will ensure that live feeds from cameras and recorded images are only viewed by approved members of staff whose role requires them to have access to such data. Recorded images will only be viewed in designated, secure offices.

7. Use of data gathered by CCTV

- 7.1 In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the data, where it is possible to do so.
- 7.2 We may engage data processors to process data on our behalf. We will ensure reasonable contractual safeguards are in place to protect the security and integrity of the data.
- 7.3 CCTV images may only be viewed by authorised employees. All authorised employees viewing the CCTV images will act with utmost probity at all times. All images viewed by authorised employees must be treated as confidential.
- 7.4 All authorised employees are to ensure that whilst viewing CCTV images, unauthorised employees or visitors cannot view the images.
- 7.5 All authorised employees viewing CCTV images are responsible for their every viewing of the images, which must be justifiable.

8. Retention and erasure of data gathered by CCTV

- 8.1 Data recorded by the CCTV system will be stored digitally. Data from CCTV cameras will not be retained indefinitely and in any case deleted after 21 days' maximum if not subject to an ongoing incident being investigated or a legitimate access request from a data subject.
- 8.2 At the end of their useful life, all images stored in whatever format will be erased permanently and securely. Any physical matter such as tapes or discs will be disposed of as confidential waste. Any still photographs and hard copy prints will be disposed of as confidential waste.
- 8.3 Routine checks are made to ensure that the system is operating in accordance with the terms of this policy, and that information relating to the recordings (date, time etc.) are accurate; these details are entered into the **CCTV Download and Maintenance Log Book** (Annex A to this document).

9. Use of additional surveillance systems

- 9.1 A DPIA is intended to assist us in deciding whether new surveillance cameras are necessary and proportionate in the circumstances and whether they should be used at all or whether any limitations should be placed on their use.

10. Requests for access and disclosure

- 10.1 Access will only ever be permitted to those who are authorised to do so for the purposes of performing their function within West Norfolk Academies Trust. Downloading images is strictly controlled and limited to the following staff:

1. Trust Chief Finance and Operations Officer – View and download
2. The Designated Behaviour Manager in each school – View and download
3. The Designated Safeguarding Lead in each school – View and download
4. Year/Pastoral Managers in each school – View and download
5. Trust Facilities Manager – View and download
6. Site Facilities Managers in each school – View and download
7. Reception staff in each school – View external cameras only
8. Two Members of The Senior Leadership Team in each school – View and download
9. Senior Site team members with the express permission of the Executive Head Teacher or Chief Finance and Operations Officer.
10. IT Support – View and download

- 10.2 Procedures for managing the saved data are detailed in the **CCTV Download and Maintenance Log Book** – staff are trained to understand the administrative regime to control the use of the images.

- 10.3 Access to images by Academy staff is restricted to:

1. Head Teachers and senior members of staff - View Only
2. Staff members required for positive identification of individuals with express permission of the Executive Head Teacher or Chief Finance and Operations Officer.

- 10.4 No images from our CCTV cameras will be disclosed to any third party, without express permission being given by Executive Head Teacher or the Chief Finance and Operations Officer of the Trust. Data will not normally be released unless satisfactory evidence that it is required for legal proceedings or under a court order has been produced.

10.5 In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime. The request must be in written form, specifying the date and time (as far as possible) of the image. If the decision is taken not to release the images, then the image in question will be held and not destroyed until all legal avenues have been exhausted.

10.6 We will maintain a record of all disclosures of CCTV footage.

10.7 No images from CCTV will ever be posted online or disclosed to the media.

11. Subject access requests

11.1 Data subjects may make a request for disclosure of their personal information and this may include CCTV images (**subject access request**). A data subject access request is subject to the statutory conditions from time to time in place and should be made in writing, in accordance with our subject access policy.

11.2 In order for us to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.

11.3 We reserve the right to obscure images of third parties when disclosing CCTV data as part of a subject access request, where we consider it necessary to do so.

12. Complaints

12.1 If any member of staff has questions about this policy or any concerns about our use of CCTV, then they should speak to their manager **OR** Human Resources (HR) in the first instance.

12.2 Where this is not appropriate or matters cannot be resolved informally, employees should use our formal grievance procedure.

13. Requests to prevent processing

13.1 We recognise that, in rare circumstances, individuals may have a legal right to object to processing and in certain circumstances to prevent automated decision making (see Articles 21 and 22 of the Data Protection Act 2018). For further information regarding this, please contact Chief Finance and Operations Officer, West Norfolk Academies Trust.

CCTV LOG BOOK

SCHOOL: _____

Building Name _____ CCTV Log Page Number _____ Ensure sequential numbering

DATE & TIME	STAFF NAME	CAMERA DETAILS Location/number	REASON FOR VIEWING/ DOWNLOAD	IF INCIDENT GIVE BRIEF DESCRIPTION OF INCIDENT AND ACTION TAKEN	IF FAULT GIVE DETAILS OF FAULT / MAINTENANCE AND ACTION TAKEN

Explanatory notes (i) Viewing of recorded images should take place in a secure, restricted area (ii) Only authorised employees are permitted to view recorded images (iii) The CCTV Manager should be informed in all cases where an incident is reported to the police (iv) Log books must be sequential in order so that pages or entries cannot be removed and full and accurate records are kept.