



CCTV POLICY

Policy Approved: December 2024
Policy Renewal: December 2026

Reviewed by the SLT MAT Board

“The Directors of the Southport Learning Trust are committed to safeguarding and promoting the welfare of children and young people at every opportunity and expect all staff and volunteers to share this commitment”

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1. Policy Statement

Southport Learning Trust uses Close Circuit Television ("CCTV") within the premises of the Southport Learning Trust. The purpose of this policy is to set out the position of the Southport Learning Trust as to the management, operation and use of the CCTV at the Southport Learning Trust.

This policy applies to all members of our Workforce, visitors to the Southport Learning Trust 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:

- General Data Protection Regulation ("GDPR")
- *[Data Protection Act 2018]* (together the Data Protection Legislation)
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998
- The Freedom of Information Act 2000
- The Protection of Freedoms Act 2012
- The Regulation of Investigatory Powers Act 2000
- This policy sets out the position of the Southport Learning Trust in relation to its use of CCTV.
- This policy operates in connection with the following Trust policies:
- Data Protection Policy
- Data retention policy

2. Purpose of CCTV

The Southport Learning Trust uses CCTV for the following purposes:

- To provide a safe and secure environment for pupils, staff and visitors.
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.
- To prevent the loss of or damage to the Southport Learning Trust buildings and/or assets.
- The Trust may use surveillance data as part of staff and pupil disciplinary and grievance processes.
- This will be communicated to students and staff through the School Privacy Notices.

3. Description of system

The systems across the Trust vary in a number of cameras and may contain fixed as well as PTZ cameras. The recorded images are stored digitally on DVR or a NVR devices. Access to the recorded images is password protected and governed by this policy. No sound recording is enabled on any of the systems.

4. 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. The Southport Learning Trust will make all reasonable efforts to ensure that areas outside of the Southport Learning Trust premises are not recorded.

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 individual have a heightened expectation of privacy, such as changing rooms or toilets.

5. Privacy Impact Assessment

Prior to the installation of any CCTV camera or system, a privacy impact assessment will be conducted by the Southport Learning Trust to ensure that the proposed installation is compliant with legislation and ICO guidance (Appendix 1)

The Southport Learning Trust 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.

6. Management and Access

The CCTV system will be managed by the Headteacher.

On a day-to-day basis the CCTV system will be operated by the Site Manager.

The viewing of live CCTV images will be restricted to Senior Leadership, ICT Network Manager and the Site Team.

Recorded images which are stored by the CCTV system will be restricted to access by the Senior Leadership, ICT Network Manager and Site Team.

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.

The CCTV system is checked weekly by the Site Manager to ensure that it is operating effectively.

Designated contractors with enhanced DBS for maintenance purposes only and only when authorised by Site Manager.

7. 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 30 days unless there is a specific purpose for which they are retained for a longer period.

The Southport Learning Trust 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 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
- Visual display monitors are not in sight of the general public and is turned off when there is no requirement to view live images.
- A log of any access to the CCTV images, including time, dates and reason of access, and a record of the individual accessing the images, will be maintained by All persons authorised to view the images and recorder on the school's central records platform.

8. 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 Policy.

When such a request is made the individuals with access noted in Section 6 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 individuals with access noted in Section 6 must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals, then the Southport Learning Trust 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
- 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 individuals with access noted in Section 6 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; and
- Whether a copy of the images was provided, and if so to whom, when and in what format.

9. Disclosure of Images to Third Parties

The Southport Learning Trust 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 individuals with access noted in Section 6 must follow the same process as above in relation to subject access requests. Detail 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 Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

10. Review of Policy and CCTV System

This policy will be reviewed bi-annually.

The CCTV system and the privacy impact assessment relating to it will be reviewed bi-annually.

11. Misuse of CCTV systems

The misuse of CCTV system could constitute a criminal offence. Any member of staff who breaches this policy may be subject to disciplinary action.

12. Complaints relating to this policy

Any complaints relating to this policy or to the CCTV system operated by the Southport Learning Trust should be made in accordance with the Southport Learning Trust Complaints Policy.

Appendix 1:

CCTV PRIVACY IMPACT ASSESSMENT



Who will be captured on CCTV?

What personal data will be processed?

What are the purposes for operating the CCTV system? Set out the problem that the Southport Learning Trust is seeking to address and why the CCTV is the best solution, and the matter cannot be addressed by way of less intrusive means.

What is the lawful basis for operating the CCTV system?

Who is/are the named person(s) responsible for the operation of the system?

Describe the CCTV system, including:

- how this has been chosen to ensure that clear images are produced so that the images can be used for the purpose for which they are obtained
- siting of the cameras and why such locations were chosen
- how cameras have been sited to avoid capturing images which are not necessary for the purposes of the CCTV system
- where signs notifying individuals that CCTV is in operation are located and why those locations were chosen; and
- whether the system enables third party data to be redacted, for example via blurring of details of third-party individuals.

Set out the details of any sharing with third parties, including processors

Set out the retention period of any recordings, including why those periods have been chosen

Set out the security measures in place to ensure that recordings are captured and stored securely

What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?

What measures are in place to address the risks identified?

Have parents and pupils where appropriate been consulted as to the use of the CCTV system? If so, what views were expressed and how have these been accounted for?

When will this privacy impact assessment be reviewed?

Approval:

This assessment was approved by the Data Protection Officer:

DPO

Date