



Griffin Primary School

CCTV Policy



1	Summary	CCTV Policy			
2	Responsible person	Lynsey Cook			
3	Accountable SLT member	Simon Witham			
4	Applies to	<input checked="" type="checkbox"/> All staff <input type="checkbox"/> Support staff <input type="checkbox"/> Teaching staff			
5	Who has overseen development of this policy	Lynsey Cook			
6	Who has been consulted and recommended policy for approval	Exec SLT, Heads, TUs			
7	Approved by and date	6 February 2024 by The Board			
8	Version number	1			
9	Available on	Every	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Trust website <input type="checkbox"/> Y <input checked="" type="checkbox"/> N Academy website <input checked="" type="checkbox"/> Y <input type="checkbox"/> N SharePoint <input checked="" type="checkbox"/> Y <input type="checkbox"/> N	
10	Related documents (if applicable)	GDPR, Privacy Notices, Data Protection Impact Assessment, Complaints, Disciplinary.			
11	Disseminated to	<input type="checkbox"/> Trustees/governors <input checked="" type="checkbox"/> All staff <input type="checkbox"/> Support staff <input type="checkbox"/> Teaching staff			
12	Date of implementation (when shared)	Autumn Term 2024			
13	Consulted with recognised trade unions	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N			



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Guiding Principles

Venn Academy Trust is a group of unique settings, with a varied need and use of closed-circuit television (CCTV). The trust supports each settings' individual use of CCTV or the decision not to use it. This policy should therefore be personalised for each setting, but will not be outside of these guiding principles.

1. Aims

This policy aims to set out the trust's approach to the operation, management and usage of closed-circuit television (CCTV) systems on the trust's property.

1.1 Statement of intent

The purpose of the CCTV system is to:

- Make members of the school community feel safe
- Protect members of the school community, building and assets before during and after school hours.
- Deter criminality in the school
- Protect school assets and buildings
- Assist police to deter and detect crime
- Determine the cause of accidents to support lessons learned
- Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings
- To assist in any concerns raised through the LADO/police/allegations or complaints
- To assist in the defense of any litigation proceedings

The CCTV system will not be used:

- To encroach on an individual's right to privacy
- To monitor people in spaces where they have a heightened expectation of privacy (including toilets and changing rooms and staff rooms)
- To follow particular individuals, unless there is an ongoing emergency incident occurring
- Primarily to monitor teaching and learning.

The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

The CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The system complies with the requirements of the Data Protection Act 2018 and UK GDPR.

2. Relevant legislation and guidance

This policy is based on:

2.1 Legislation

- UK General Data Protection Regulation
- Data Protection Act 2018
- Human Rights Act 1998
- European Convention on Human Rights
- The Regulation of Investigatory Powers Act 2000
- The Protection of Freedoms Act 2012
- The Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998
- The Children Act 1989
- The Children Act 2004
- The Equality Act 2010

2.2 Guidance

- Surveillance Camera Code of Practice (2021)

3. Location of the cameras

Cameras are located in places that require monitoring in order to achieve the aims of the CCTV system (stated in section 1.1).

Members of staff at each school will have access to details of where CCTV cameras are situated – see appendix A for a map.

Wherever cameras are installed appropriate signage is in place to warn members of the school community that there is CCTV. Example signage can be seen at appendix D.

Cameras are not and will not be aimed off school grounds into public spaces or people's private property.

4. Roles and responsibilities

4.1 The Head of School/Headteacher at each school

The Head of School/Headteacher will:

- Take responsibility for all day-to-day leadership and management of the CCTV system
- Ensure that the guidance set out in this policy is followed by all staff
- Decide, in consultation with the DPO, whether to comply with disclosure of footage requests from third parties, either verbally or in writing.
- Maintain a record of access, to the release of footage or any material recorded or stored at school.
- Take further advice from ICO if required.

4.2 The data protection officer (trust wide)

The data protection officer (DPO) will:

- Monitor compliance with UK data protection law
- Act as a point of contact for communications from the Information Commissioner's Office
- Ensure data is handled in accordance with data protection legislation
- Ensure footage is obtained in a legal, fair and transparent manner
- Ensure footage is destroyed when it falls out of the retention period
- Keep accurate records of all data processing activities and make records
- Ensure that the CCTV system is not infringing on any individual's reasonable right to privacy in public spaces
- Carry out assurance checks to determine whether footage is being stored accurately, and being deleted after the retention period

4.3 The nominated system manager in this school is Andy Kitchin, School Business Manager.

The system manager will:

- Take care of the day-to-day maintenance and operation of the CCTV system
- Check the system for faults and security flaws regularly.
- Ensure the data and time stamps are accurate regularly.
- Will be adequately trained in regard to operation, storage, and access.

5. Operation of the CCTV system

The CCTV system will be operational 24 hours a day, 265 days a year.

At Griffin Primary School, the CCTV system will only record audio in the Main Reception area.

The associated Data Protection Impact Assessment for Griffin Primary School is attached.

6. Storage of CCTV footage

Footage will be retained for 30 days. At the end of the retention period, the files will be overwritten automatically.

On occasion footage may be retained for longer than 30 days, for example where a police ask for it, to give them the opportunity to view the images as part of an active investigation, or the Local Authority Designated Officer has requested it, or there are probable legal proceedings the school is made aware of. The data may be used within the trust's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures. Where appropriate, staff will be informed their data is being retained.

Recordings will be downloaded and held securely, so that it can be used as evidence if required. In this school they will be stored on the CCTV hard drive.

The DPO will carry out annual checks to determine whether footage is being stored accurately, and being deleted after the retention period.

7. Access to CCTV footage

Access to rewind and review footage will only be given to persons authorised by the Head of School with a just case for review and for the purpose of pursuing the aims stated in section 1.1.

Any visual display monitors showing live streaming will be positioned in the school admin office. Windows will be covered by blinds to ensure people external to the organisation can not view images.

In this school, the monitors are displayed in the school admin office.

All staff are bound by confidentiality and live streaming would only be seen by employees, particularly admin staff and the senior leadership team.

7.1 Staff access

The following members of staff have authorisation to access the rewind and review CCTV footage:

- The headteacher in each school (or someone with express permission of the headteacher).
- The data protection officer for the trust.
- The system manager in each school.



CCTV footage will only be accessed from authorised personnel's work devices, or from the visual display monitors within school.

Any member of staff who misuses the CCTV system may be committing a criminal offence, and may face disciplinary action.

7.2 Subject access requests (SAR)

According to UK GDPR and Data Protection Act 2018, individuals have the right to request a copy of any CCTV footage of themselves. Please see the GDPR policy.

Upon receiving the request the school will immediately issue a receipt and will then respond within one month. The school reserves the right to extend that deadline during holidays due to difficulties accessing appropriate staff members.

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. Images that may identify other individuals need to 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 instead.

Footage that is disclosed in a SAR will be disclosed securely to ensure only the intended recipient has access to it. An example of the information recorded when a SAR is made is at appendix B

Individuals wishing to make an SAR can find more information about their rights, the process of making a request, and what to do if they are dissatisfied with the response to the request on the [ICO website](#).

7.3 Third-party access

CCTV footage will only be shared with a third party (or the individual) to further the aims of the CCTV system set out in section 1.1 (e.g. assisting the police in investigating a crime).

Footage will only ever be shared with authorised personnel such as the police, the LADO or other service providers who reasonably need access to the footage (e.g. investigators) with the agreement of the headteacher.

All requests for access should be set out in writing or verbally and the request recorded.

The school will comply with any court orders that grant access to the CCTV footage.

The school will provide the courts with the footage they need without giving them unrestricted access.

All CCTV disclosures will be recorded, the headteacher will inform the DPO.

8. Data protection impact assessment (DPIA)

The trust follows the principle of privacy by design. Privacy is taken into account during every stage of the deployment of the CCTV system, including its replacement, development and upgrading.

The system is used only for the purpose of fulfilling its aims (stated in section 1.1).

When the CCTV system is replaced, developed or upgraded a DPIA will be carried out to be sure the aim of the system is still justifiable, necessary and proportionate.

If any security risks are identified in the course of the DPIA, the school will address them as soon as possible.

A copy of the DPIA can be found at appendix C.

9. Security

- The system manager will be responsible for overseeing the security of the CCTV system and footage
- The system will be checked for faults once a term
- Any faults in the system will be reported as soon as they are detected and repaired as soon as possible, according to the proper procedure
- Footage will be stored securely
- Cyber security measures will be put in place to protect the footage from cyber attacks
- Any software updates (particularly security updates) published by the equipment's manufacturer that need to be applied, will be applied as soon as possible

10. Complaints

Complaints should be directed to the headteacher and should be made according to the school's complaints policy. Staff members could use the grievance policy.

11. Monitoring

The policy will be reviewed annually (or more frequently if changes occur) by the Headteacher to consider whether the continued use of a CCTV cameras remains necessary, proportionate and effective in meeting its stated purposes.

Appendix A – Map of cameras in each school

One CCTV camera is located in the main school Reception.

The rest of the CCTV cameras are located outside of the school building, within the perimeter of the school grounds. These cameras only cover the internal perimeter of the school.



Appendix B – Record of SAR template of information

Name of requestee	Date of request	Parameters of the Search	Reason for the request	Discussed with DPO	Date data disclosed	Format data disclosed



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Appendix C – Data Protection Impact Assessment

Identified Hazards	Who may be affected	Risk Level before control measures S x P = R				Control measures required	To be actioned by	Completion date	Final Risk level S x P = R			
		S	P	R	RR				S	P	R	RR
Positioning of CCTV and the issue of privacy	The public	1	1	1	Low	None required	n/a	n/a	1	1	1	Low
Height of cameras could welcome vandalism	The property	2	2	4	Med	Ensure where ever possible cameras are high, or domed into ceilings to prevent vandalism, and waterproof	SBM	ASAP	2	1	2	Low
Maintenance of CCTV equipment costing more than the budget	The finances	2	2	4	Med	Keep up to date with servicing – ensure new ones are under warranty	SBM	ASAP	2	1	2	Low

CCTV policies and procedures not in place or not followed, leading to inconsistencies , etc	Pupils, parents, staff, visitors	2	2	4	Med	Ensure automatic deletion of footage after 28 days. Be strict with rules Internally assurance carried out by DPO Regular review of policies and privacy notices.	Head DPO	Ongoing Head Termly Annual	2	1	2	Low
Audio of private conversation overheard in reception areas of staff	Staff	2	2	4	Med	Ensure staff are aware of the audio function in reception – reiterate the need is due to keep them safe. Headteacher to only listen if there is a need for it/incident occurs.	Head	Ongoing	2	1	2	Low

Appendix D – The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the academy
- The contact telephone number or address for enquiries



