



# CCTV Policy

Version:	4.0
Approved by:	Finance, Audit and Risk Committee
Issue Date:	June 2021
Last Review Date:	November 2024
Next Review Date:	November 2026

## REVIEW HISTORY

VERSION NO.	DATE OF CHANGE	CHANGE SUMMARY	PAGE NO.
1.0	June 2021	Draft for Finance & Audit Committee	
2.0	June 2022	Added contents page and page numbers; formatted in line with Trust brand guidelines.	
3.0	June 2023	Re-branded	
		Updated Academies Trust to Multi Academy Trust	
4.0	Nov 2024	Various minor changes in accordance with DPO	

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## **Policy statement**

Oak Multi Academy Trust (the Trust) uses Close Circuit Television (“CCTV”) within the premises of the Trust.

The policy outlines how the Trust uses CCTV in line with the principles set out within the Surveillance Camera Code of Conduct 2021. All personal data obtained is stored in accordance with UK General Data Protection Regulations (UKGDPR) and Data Protection Act 2018.

This policy applies to all members of our Workforce, visitors to Oak Multi Academy Trust premises and all other persons whose images may be captured by the CCTV system.

## **Purpose of CCTV**

The Trust uses CCTV for the following purposes:

- Prevention and detection of crimes, in the Trust and its premises
- Student behaviour management, discipline and exclusions
- Staff disciplinary and associated processes and appeals
- Maintaining a safe environment for the whole Trust community

## **Description of system**

The Trust sites uses fixed and moved cameras on sites. The CCTV system will be operational 24 hours a day, 365 days a year. The Data Controller is registered with the Information Commissioner’s Office. Cameras are not equipped for sound recording. All recordings will have date and time stamps.

## **Location of Cameras**

The cameras are located in places that require monitoring in order to achieve the purpose of the CCTV system.

Appropriate signs are displayed around the Trust premises within prominent location that clearly identifies that CCTV recording is in operation.

Cameras will not be sited in areas where individual have a heightened expectation of privacy, such as changing rooms or toilets.

## **General access to CCTV footage**

It will not be common practice to release CCTV footage unless satisfactory evidence for legal proceedings a secure legal basis can be provided. This is authorised within Section 115, Crime and Disorder Act 1998.

In appropriate circumstances, the Trust may allow authorised personnel to view footage where the above purposes are considered.

The Trust will maintain a record of all disclosures.

All requests for access should be made in writing to the system manager, Trust Estates Manager Paul Clarke, and the relevant headteacher, and be specific to a date and time frame.

Any disclosure will be done in line with UK GDPR and Data Protection.

The Trust cannot guarantee disclosure of footage when made under a Subject Access Request due to:

- lack of technical resources available in order to blur or redact the footage
- the release of footage would prejudice an ongoing investigation
- other identifiable individuals have not consented

The viewing of live CCTV images will be restricted to members of staff in academies and trust offices with explicit powers to view images, for the reasons set out above.

Recorded images which are stored by the CCTV system will be restricted to access by members of staff in academies and trust offices with explicit powers to view images, for the reasons set out above.

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 appropriate staff members in academies to ensure that it is operating effectively.

### **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 thirty days unless there is a specific purpose for which they are retained for a longer period.

On occasion footage may be retained for longer than thirty days. For example, where a law enforcement body is investigating a crime.

Recordings will be downloaded and encrypted, so that the data will be secure, and its integrity maintained, to ensure it can be used as evidence if required.

All recordings must be logged and traceable throughout their life within the system.

### **CCTV system security**

A full Data Privacy Impact Assessment will be completed upon deployment, replacements, development or upgrading of the CCTV system. This is in line with the UK GDPR principle, Privacy by Design, and ensures the aim of the system is reasonable, necessary and proportionate.

The system will be made secure by the following safeguards:

- the system manager will be responsible for overseeing the security of the footage and recorded images, maintenance and training of authorised personnel

- the system will be checked for faults each week
- the footage will be stored securely and encrypted
- the software updates will be installed as soon as possible
- the recorded footage will be password protected
- the equipment will be located in a secured lockable enclosure accessible only to authorised personnel
- adequate cyber security measures will be in place to protect footage from cyber-attacks
- a register of authorised staff is maintained, reviewed and updated when necessary

### **Covert recording**

The Trust will only 'covert record' when the following criteria are met:

- an assessment concluded that if we had to inform individuals that recording was taking place it would prejudice our objective
- there is reasonable cause to suspect specific criminal activity or actions that could result in a serious breach of staff or volunteer behaviour expectations is taking place
- covert processing is carried out for limited and reasonable period of time and related to specific suspected criminal activity
- if the situation arises where the Trust adopts 'covert recording', there will be a clear documented procedure which sets out how the decision to record covertly was reached, by whom and the risk of intrusion on individuals

### **Review of Policy and CCTV System**

The CCTV system and the privacy impact assessment relating to it will be reviewed annually. Appropriate changes will be made accordingly in line with changes to legislation.

### **Complaints relating to this policy**

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