



CCTV Policy

This policy applies to all the academies in the
Lionheart Academies Trust

December 2020-22

Date	Detail
01.01.17	Original, based on Beauchamp College Policy
25.05.18	Updated and approved by Lionheart Academies Trust
01/12/2019	Updated policy to include in vehicle camera use



1.0 Purpose

- 1.1 This policy is to regulate the management and use of the closed circuit television (CCTV) system at all schools/colleges within the Lionheart Academies Trust (The LAT).
- 1.2 The Lionheart Academies Trust (The LAT) has established the following CCTV Policy to clearly set out expected behaviours from all staff within the Lionheart Academies Trust 'the Trust'.
- 1.3 Staff must read and understand the Acceptable Use Policy, the Mobile Phone Policy and the Data Protection Policy in conjunction with this policy.
- 1.4 This CCTV scheme and policy is operated within the Information Commissioner's Code of Practice for CCTV (2017) and Surveillance Camera Code of Practice (2013) published by the Home Office.
- 1.5 For the avoidance of doubt the CCTV system is a digital system which is owned wholly by the school/college and is an entirely closed system with no wireless capability. The system does not make audio recordings

2.0 Policy

- 2.1 This CCTV Policy applies to all Staff engaged in any LAT activity.
- 2.2 For the purposes of this policy, the term "Staff" means all members of LAT staff including permanent, fixed term, and temporary staff, governors, secondees, any third party representatives, agency workers, volunteers, interns, agents and sponsors engaged with the LAT in the UK or overseas. This policy also applies to all members of staff employed by any of the LAT's subsidiary companies.
- 2.3 Authorised Adults, Students, Staff and Third Parties are informed of the Trust's use of CCTV recordings within school premises and inside school vehicles through the relevant privacy notice.

3.0 The CCTV Scheme

- 3.1 Along with a range of measures, the CCTV system will be used to:
 - Help maintain an environment for students, staff and others, which supports their safety and welfare
 - Deter crime against persons, and against the school/college buildings and school/college assets.
 - Assist in the identification and prosecution of persons having committed an offence
 - Monitor activities within the school/college and grounds in line with the objectives of the scheme.

The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act (1998) and The General Data Protection Regulations (2018). It will seek to comply with the requirements of these acts, along with the Commissioner's Code of Practice and the Surveillance Camera Code of Practice (2013) published by the Home Office.

- 3.2 The Trust will treat as data all CCTV recordings and relevant information. All schools/colleges within the trust will abide by the Data Protection Policy when handling data.

- 3.3 Static cameras are set as to not focus on private homes, gardens and other areas of private property.
- 3.4 Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained in writing for directed surveillance to take place, as set out in the Regulation of Investigatory Power Act (2000).
- 3.5 Materials or knowledge secured as a result of CCTV will not be released to the media, or used for any commercial purpose, or for the purpose of entertainment. Recordings will only be released under the written authority from the Police, or in respect of a subject access request (SAR).
- 3.6 When planning the layout of a CCTV system The Trust has endeavoured to ensure that the scheme will give maximum effectiveness and efficiency. It is not possible, however, to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.
- 3.7 Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the schools/colleges CCTV.

4.0 Operation of the CCTV System

- 4.1 The system will be administered by the IT Manager, Site Manager and relevant premises staff, in accordance with the principles and objectives expressed in the code.
- 4.2 The Main CCTV system control unit will be installed in a secure location with restricted access.
- 4.3 The CCTV system will be in operation 24 hours each day, for every day of the year.
- 4.4 The Site Manager will check on a weekly basis that the system is operating effectively and in particular that the equipment is properly recording and that cameras are functional.
- 4.5 The system will be regularly serviced and maintained. Defects will be reported to the servicing company at the earliest convenient opportunity.
- 4.6 Access to the CCTV software will be strictly limited to Authorised Operators and secured with a strong password. The Premises Manager at each site should keep an up-to-date register of the Authorised Operators for their site
- 4.7 Authorised Operators must satisfy themselves that all persons viewing CCTV material will have a right to do so.
- 4.8 Other administrative functions will include controlling and maintaining downloaded digital materials, and maintenance and system access logs.
- 4.9 Where monitors are used for viewing live CCTV images, physical barriers must be put in place so that unauthorised persons cannot also view the images.

5.0 Procedures for Viewing CCTV Images

- 5.1 Live and recorded materials may be viewed by authorised operators when investigating an incident and recorded material may be downloaded from the system in line with the objectives of the scheme.
- 5.2 Images (stills and video footage) may be viewed by the Police for the detection of crime.



- 5.3 Copies of images (stills and video footage) may be released to Police or other authorised applicants subject to them completing a 'Request for Personal Data to Assist with Enquiries' form.
- 5.4 A record will be maintained of the release of images to the Police or other authorised applicants. A register will be available for this purpose.
- 5.5 The Police may require the school/college to retain images for possible use as evidence in the future. Such images will be securely stored until they are needed by the Police.
- 5.6 Applications received from outside bodies (e.g. solicitors) to view or release images will be referred to the Data Protection Officer who will advise the applicant on the SAR process. In these circumstances, images will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order.
- 5.7 Retention: Images will be retained for only as long as these are required as per the Data Protection Policy.

6.0 CCTV use in vehicles

- 6.1 The Trust may use CCTV in school vehicles such as the school's mini bus for the protection and safeguarding of both the students and the driver. This data is processed under the legal basis of legitimate interest.
- 6.2 The school will ensure that only devices that meet the Trust specification will be installed and used.
- 6.3 CCTV footage will be reviewed where a student, parent, third party or staff complaint or concern is made.
- 6.4 Staff drivers are advised, as per their contract, that data revealed through CCTV recordings may be used in disciplinary investigations, where relevant.

7.0 Complaints and Subject Access

- 7.1 Under the Data Protection Act 2018, data subjects have the right to request access to their data and as such relevant CCTV recordings. However, in accordance with the Data Protection Act 2018, CCTV recordings that contains third party data cannot be released.
- 7.2 To gain access to the CCTV recordings, data subjects are required to complete a Subject Access Request Form, which is available on the Trust and schools website. Should the Trust be able to comply with this request under the Data Protection Act 2018, an accompanied viewing will be arranged.
- 7.3 The Trust reserves the right to refuse requests for CCTV recordings should it compromise The Data Protection Act 2018 through revealing third party data.
- 7.4 Any complaints about the school's CCTV system or requests for access should be addressed to the Trust Data Protection Officer:



The Data Protection Officer
Lionheart Academies Trust,
C/O Beauchamp College,
Ridge Way,
Oadby
LE2 5TP

Telephone: 0116 2729117

E-mail: DPO@lionhearttrust.org.uk

8.0 Review

- 8.1 This policy will be reviewed periodically as it is deemed necessary to ensure that it remains appropriate and up to date. These reviews will be no less frequently than every two years. The policy review will be undertaken by the LAT Board.