Aston Community Education Trust

ACET
CCTV Policy

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POLICY LEAD: Natalie Borrington

APPROVED BY: Finance Risk Audit & People Committee

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V1	February 2025	New Policy	

Contents

1. Aims

This policy aims to set out Aston Community Education Trusts (ACETs) approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on any academy property. All employees across the Trust are required to adhere to this policy.

2. 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 from harm to themselves or to their property
- Deter criminality in the school
- Protect school assets and buildings
- Assist police to deter and detect crime
- Determine the cause of accidents
- Assist in the effective resolution of any disputes.

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

The Trust has identified the following legal bases for processing CCTV footage which will include personal data; UK GDPR Article 6(1)e (public task) and Article 9(2)(g) (substantial public interest) and Data Protection Act 2018 Schedule 1, paragraph 10 (preventing or detecting unlawful acts) and paragraph 36 processing criminal category data for purposes of substantial public interest.

The Trust will seek to comply with the requirements both of the Data Protection Act ("the Act"), the Information Commissioner's Guidance on Video Surveillance and the Surveillance Camera Commissioner's Code of Practice.

Footage or any information gleaned through the CCTV system will never be used for commercial purposes.

In the unlikely event that the police request that CCTV footage be released to the media, the request will only be complied with when written authority has been provided by the police, and only to assist in the investigation of a specific crime.

The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Cameras will not record any private premises.

Signs that inform people of the existence of CCTV, as required by the Code of Practice of the Information Commissioner have been placed at access routes to areas covered by the academy CCTV.

A log will be kept of Authorised Staff who have accessed academy CCTV footage. (see appendix 1)

3. Operation of the CCTV system

The Scheme is administered and managed by the Trust, in accordance with the principles and objectives expressed in this policy.

No live feeds will be presented within offices at our academies that aren't considered secure or private locations. Live feeds are available to authorised staff for the management of the academy, security of the site and safety of staff and pupils, and viewable from the Digital Video Recorder and monitor used by the CCTV solution only. Remote viewing is strictly prohibited, except for out-of-hours security purposes when no young people are on-site, and only on a Trust-issued device.

The CCTV system will be operational 24 hours a day, 365 days a year.

The system is registered with the Information Commissioner's Office.

The system will not record audio.

Recordings will have date and time stamps. This will be checked by the system manager termly and when the clocks change.

4. 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 law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation.

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

Termly checks will be carried out to determine whether footage is being stored accurately, and being deleted after the retention period. Footage required for ongoing cases may be held longer than the stated retention period and will be held only as long as necessary.

5. Access to CCTV footage

Access will only be given to authorised persons, for the purpose of pursuing the aims stated in section 2, or if there is a lawful reason to access the footage.

Any individuals that access the footage must record their name, the date and time, and the reason for access in the access log.

Any visual display monitors will be positioned so only authorised personnel will be able to see the footage.

5.1 Staff access

The following members of staff have authorisation to access the CCTV footage and have the responsibility to manage the individuals who they permit to view the footage. The following members of staff are known as the ACET CCTV Operators:

- The academy Principal and Vice Principal
- The CCTV System Manager (Approved IT or Estates Personnel)
- The Trust Data Protection Officer
- Anyone with express permission of the CEO or Principal

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

All members of staff who have access will undergo training to ensure proper handling of the system and footage.

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

5.2 Printed and Recorded Media Procedures

In the event of an incident requiring footage from the system to be retrieved and stored the following procedure should be followed:

- The details of the incident should be passed to the Principal, who will authorise the use of the system by an authorised CCTV operator.
- The relevant footage will be identified.
- An entry shall be made on the Recorded Image Viewing Log.
- If the footage is required for investigation, then the User will produce a copy. The Date and Time of the recorded extract will be registered and stored in a secure place.
- The footage may only be viewed by Authorised Staff.
- A record of all viewings shall be made, which if required as evidence, may be released to the Police.
- Applications received from outside bodies or Subject Access Requests to view or release records will be notified to the Principal.

5.3 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.

Requests for Data Subject Access should be made in accordance with the ACET Subject Access Request Procedure which can be found within the ACET Data Protection Policy on the Trust website.

6. System Review

One of the Authorised CCTV Operators will check and confirm the screen and cameras are working termly.

Regular reviews of the system's operation will take place and any necessary changes in procedure and camera sighting/position will be implemented.

The Trust will carry our regular reviews of the use of CCTV using the IAM Compliant software.

The Trust will carry out a Data Protection Impact Assessment where necessary to review the use of CCTV where there is any significant change to the use of the system or the purpose for which is it used.

7. Body & Dash Cameras

The purpose of this equipment follows the above statement of intent for our CCTV

These devices are used in Trust Vehicles when transporting students. (only in staff personal vehicles transporting pupils as a last resort with the correct ratio at the agreement of the Principal).

The identified staff will make sure that the vehicles clearly state that there is recording equipment being used for the journey.

Data will be stored in the form of SD cards that will be stored in a locked area, SD cards will be cleared of data weekly, unless an identified situation has taken place and an investigation is being carried out. SD cards will be numbered.

Termly checks will be carried out on the equipment.

8. Breaches of this policy

Any breach of this Policy by school staff will be initially investigated by the Principal, in order for them to take the appropriate disciplinary action.

Any serious breach of this Policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

9. Complaints

Complaints should be directed to the Principal and should be made according to the school's complaints policy which is available via the Trust and Academy websites.

10. Monitoring

This policy will be reviewed annually by the Trust DPO to consider whether the continued use of a surveillance camera remains necessary, proportionate and effective in meeting its stated purposes. The approval of this policy sits with the Trust Board.

APPENDIX 1: ACET CCTV ACCESS LOG

ACET CCTV Access Log					
Authorised Staff Member Name	**Camera Number/Location**	**Date and Time of recording**	**Reason for Viewing (e.g. Vandalism, Behaviour incident)**	**Further Action Taken (e.g. saved or shared?)**	**Notes**