



Hadrian Learning Trust

CCTV policy

September 2024

Next review date: Sept 2025

Introduction

Hadrian Learning Trust uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for students, staff and visitors, and to prevent the loss of, or damage to, school property. As might be expected, this includes the protection and safeguarding of children, especially vulnerable children.

The system comprises a number of fixed cameras. We do not record audio through the CCTV system.

The CCTV system is owned and operated by the school and is maintained by a private company under contract. The deployment of the cameras is determined by the school's Senior Leadership Team.

Any future changes to the CCTV system or its capacity will be notified to parents/carers, students and staff.

The Hadrian Learning Trust CCTV system is registered with the **Information Commissioner's Office** under the General Data Protection Regulation 2018. The use of CCTV, and the associated images is covered by the GDPR. This policy outlines the school's use of CCTV and how it complies with the Regulations.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the school in their responsibilities under the **ICO's CCTV Code of Practice**, to which the school subscribes. All employees are aware of the restrictions in relation to access to and disclosure of recorded images.

The number of authorised operators and employees with access to images is very tightly restricted and comprises the senior leadership team and heads of year (for investigating behaviour and safeguarding incidents) and the Site Manager and head of IT (for investigating incidents of trespass, vandalism, or investigating staff or student injury claims). Software is installed on individual computers and is password-protected, unique to the person concerned.

Statement of Intent, Rationale and Purpose

Hadrian Learning Trust complies with the **Information Commissioner's Office (ICO) CCTV Code of Practice** to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

CCTV warning signs will be clearly and prominently placed at all external entrances to the school building, including school gates if coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV.

The planning and design of the CCTV system has endeavoured to ensure that it 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.

Siting of Cameras

Cameras have been sited so they only capture images relevant to the purposes for which they were installed (see above) and care will be taken to ensure that reasonable privacy expectations are not violated. Hadrian Learning Trust will ensure that the location of equipment is carefully considered so that images captured comply with the General Data Protection Regulation.

Hadrian Learning Trust will make every effort to position cameras so that their coverage is restricted to school premises, which may include outdoor areas. There is no intention to cover public spaces as

defined in Section 16(b) of the Public Order Act 1986 and therefore the school does not have to meet the Security Commissioner's Office Surveillance Camera Code of Practice, but supports the provisions therein, nonetheless. In general CCTV will not be used in classrooms but in areas which are less easily monitored by other means and where experience suggests incidents of the kind being monitored are more likely to take place. CCTV is used in IT suites to reduce damage to equipment. CCTV is not used in private areas such as changing rooms, toilet cubicles or urinals. However, CCTV is used in the wash-basin areas. This arrangement has been referred to the Information Commissioner's Office and is deemed compliant with Article 5(c) of GDPR. Members of staff are aware of fixed camera locations.

Storage and Retention of CCTV Images

Recorded images will not be retained for longer than is necessary. Secure deletion is automatic, based on a predetermined overwrite function after a specified period of time, which can be increased or reduced as required. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. All retained data will be stored securely and access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available.

Data Subject Access Requests

Individuals have the right to request access to CCTV footage relating to themselves, under the General Data Protection Regulation. All requests must be made in writing to the Executive Headteacher. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage being requested to be identified e.g. time, date and location.

Hadrian Learning Trust will respond to such requests within 40 calendar days of receiving the written request. Hadrian Learning Trust reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals, give rise to safeguarding concerns or jeopardise an ongoing investigation.

Access to and Disclosure of Images to Third Parties

There will be no disclosure of recorded data to third parties other than to statutory bodies such as the Police, Fire Brigade Investigators or the Health and Safety Executive, or service providers where these may reasonably require access to the data e.g. CCTV system maintenance engineers tracing and identifying a fault.

All such Third Party requests should be made in writing to the Headteacher. Recorded images may be used in the school's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

Complaints and Further Information

Complaints and enquiries about the operation of CCTV in the school should be directed to the Data Protection Officer, David Clay, email: dclay@gehs.net

Further information on CCTV and its use in schools is available from the following:

The Surveillance Camera Code of Practice (2021) -
<https://www.gov.uk/government/publications/update-to-surveillance-camera-code>

Security Camera Commissioner's Office -

www.gov.uk/government/organisations/surveillance-camera-commissioner

Regulation of Investigatory Powers Act (RIPA) 2000 www.legislation.gov.uk/ukpga/2000/23/contents

General Data Protection Act 2018 – <https://ico.org.uk>