Harbour Schools Partnership

A guiding light for education

CCTV Policy

Date Adopted: 24.9.25

Reviewed on:

Author/owner: Board of Trustees

Anticipated Review: Annual

NB. 'Trustees' means the Directors referred to in the Trust's Articles of Association.

Introduction

History of most recent policy changes

Version	Date	Page	Change	Origin of Change e.g. TU request, Change in legislation
1	24.9.25	New	Harbour Policy – merged policies from Ventrus & Tarka Polices in line with current legislation	

Links to other Trust Policies

Data Protection Policy
Discipline Policy
Grievance Policy

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1.0 Introduction

The Harbour Schools Partnership's schools may use closed-circuit television (CCTV) in order to protect the safety of students, staff, parents/carers and visitors.

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

Changes to CCTV monitoring will be subject to consultation with staff.

2.0 CCTV Intended Purpose

The CCTV surveillance is intended for the purpose of maintaining a safe environment for the whole school community, specifically:

- Protecting the school buildings and assets, both during and after school hours
- Promoting the health and safety of staff, pupils, and visitors.
- Preventing bullying.
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
- Supporting the police in a bid to deter and detect crime.
- Assisting in identifying, apprehending, and prosecuting offenders.
- Ensuring that the school rules and codes of conduct are respected, so that the school can be properly managed.

3.0 CCTV System Operation

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

The Data Controller (The Harbour Schools Partnership) is registered with the Information Commissioner's Office. The Trust's registration number is Z2879577.

Schools will specify if the system does or does not record audio.

All recordings will have date and time stamps.

4.0 Location of Cameras

The cameras are located in places that require monitoring in order to achieve the purpose of the CCTV system. They are located to give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will detect every single incident taking place within the areas of coverage.

Schools will make every effort to position cameras so that coverage is restricted to their premises.

Care will be taken to ensure reasonable privacy expectations for not violated.

Cameras will not generally be used in classrooms. If CCTV is placed in classrooms, there must be advanced written consent of the Trust Executive Leadership Team and consultation with parents in advance. A DPIA would be completed by the Headteacher, agreed by a Trust Director of School Improvement and in consultation with the DPO

Appropriate signs are displayed around the school's premises within prominent locations that clearly identifies that CCTV recording is in operation.

Location of signs includes the entrance gate(s) where coverage includes outdoor areas, building entrance(s) and inside reception.

5.0 Access to CCTV Footage

Access to recorded images will be restricted to those staff authorised to view them where the above purposes are considered and will not be made more widely available unless satisfactory evidence for a secure legal basis can be provided. This is authorised within Section 115, Crime and Disorder Act 1998.

The school will maintain a record of all disclosures.

5.1 Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the GDOR and Data Protection Act 2018.

- All requests for footage under (SAR) should be made in writing to the Headteacher with sufficient information to enable the footage to be located such as the date, time & location.
- The Headteacher will contact the DPO immediately for advice
- Any disclosure will be done in line with UK GDPR and Data Protection Act.

The school 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.

5.2 Access & Disclosure to Third Parties

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the police, and service providers to the school, where these would reasonably need access to the data (e.g. investigators).
These will be actioned once guidance from the DPO has been sought.

Any parent requests should be made to the school. It will be treated as a Subject Access Request and the process set out above will apply. Parents can view the footage, but only if no other pupil(s)' images are on view. Redacted screen prints may be considered as an alternative.

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.

6.0 Authorised CCTV System Operators

The school has limited staff members, who are fully trained and understand the importance of confidentiality, authorised to access and operate the CCTV system.

The System Manager and authorised personnel within the school are identified in section 12 of this policy.

7.00 Storage of Footage

Footage will be retained for no longer than necessary to achieve the purposes of the system.

The retention period will usually be 30 days, but schools will specify their time frame. At the end of the retention period, the files will be overwritten by new footage.

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

Only the Headteacher or Trust Executive Leadership Team will be permitted to authorise the download and storage and retention of footage.

Storage must be within Office 365, and password protected, so that the data will be secure, and its integrity maintained, to ensure it can be used as evidence if required. Footage should be encrypted if sharing footage

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

8.0 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 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 in a secure area
- live footage can only be viewed by 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.

9.0 Covert Recording

The school may in exceptional circumstances set up covert monitoring, for example:

- Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct.
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

9.1 Process to instigate covert recording

If the circumstances described above are met

- Advanced written consent must be obtained by the Headteacher from the Executive Leadership Team in consultation with the Data Protection Officer.
- A data protection impact assessment will be carried out by the Headteacher, prior to any covert monitoring and must be signed off by the Data Protection Officer and Director of School Improvement.
- Covert monitoring must cease following completion of an investigation.
- Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles.
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10.0 Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance, who will consult with the Data Protection Officer, and act in accordance with the Trust Complaints Policy and Procedures.

11.0 Review & Monitoring

Appropriate changes will be made by the Trust accordingly in line with changes to legislation.

The headteacher will communicate changes to all authorised staff members.

12.0 School Specific Information

Name of School	Eden Park Academy
CCTV System Manager	Ian Sailsbury
Authorised Personnel for CCTV access	*Ian Sailsbury and Georgia Newman* The Harbour Schools Partnership Executive Leadership Team – viewing of footage only
Does the system record audio	/ No
Retention Period	30 days (unless otherwise stated)