CCTV Policy

ACE Derbyshire Trust

Version 2.0

Last Reviewed	**September 2025**
Reviewed By (Name)	**Katherine Collins**
Job Role	**School Business Manager**
Next Review Date	**September 2026**
Version produced Spring 2025	Amendments: Updated the words 'must' and 'should' to **'will'** where necessary throughout. Amended 'Surveillance Camera Commissioner' to 'Biometrics and Surveillance Camera Commissioner'. Annexe 1: CCTV System Annual Review Form (example)- updated and sections added.

This document will be reviewed annually and sooner when significant changes are made to the law.

Guidance from the Department for Education about school policies can be found here: https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts

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1. Introduction

1.1 The purpose of this Policy is to regulate the management, operation and use of the closed-circuit television (CCTV) systems at ACE Derbyshire Trust

1.2 The system comprises a number of fixed cameras located around the school sites. All CCTV recorders are password protected and monitoring is only available to authorised staff.

1.3 This Policy follows Data Protection guidelines, including guidance from the Information Commissioner's Office and the Biometrics and Surveillance Camera Commissioner.

1.4 The CCTV system is owned by the schools in the trust.

1.5 Authorised Staff

- Trust leadership team
- Headteacher
- Senior Leadership Team Members
- School Business Officers
- Premises Manager

2. Purposes of the CCTV Scheme

2.1 (a) To protect the school buildings and their assets
(b) To increase personal safety and reduce the fear of crime
(c) To support the law enforcement agencies e.g. police in a bid to deter and detect crime
(d) To assist in identifying, apprehending and prosecuting offenders
(e) To assist with the safeguarding and supervision of pupils

2.2 The school 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.

3. Statement of Intent

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

3.2 The school will treat the system and all information, documents and recordings obtained and used as personal data which are protected by the Act.

3.3 Cameras will be used to monitor activities within the school to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of members of the school community and members of the public.

3.4 Materials or knowledge obtained as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of law enforcement agencies e.g. police. Recordings will never be released to the media for purposes of entertainment.

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3.5 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.

3.6 Cameras will not record any private premises.

3.7 Signs that inform people of the existence of CCTV, as required by UK GDPR and guidance from the Information Commissioner have been placed at access routes to areas covered by the school CCTV.

3.8 A log is kept of Authorised Staff access to Recorded Images (template below).

4. Operation of and Access to the System

4.1 The Scheme is administered and managed by school Headteachers and Senior Leadership Team, in accordance with the principles and objectives expressed in this policy.

4.2 Images can be accessed via screens and are password protected.

4.3 Live feeds are available in the main reception from the CCTV recorder control console. Live feeds are available to authorised staff for the management of the school security of the site and safety of staff and pupils.

4.4 The CCTV system will be operated 24 hours each day, every day of the year.

4.5 CCTV recordings will be available for 30 days unless copied to removable media (CDs, DVDs or tapes etc). After this time any recordings will be automatically overwritten. Where CCTV is copied to be retained for longer periods this will be documented and justified in the Access Log. In this case, the footage will be held in accordance with the Trust Retention Schedule.

5. Printed and Recording Media Procedures

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

- The details of the incident will be passed to the school Headteacher / SLT, who will authorise the use of the system by an authorised user.
- 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 law enforcement agencies e.g. police.
- Applications received from outside bodies or Subject Access Requests to view or release records will be notified to the Headteacher.

6. Assessment of the System

6.1 The School Business / Premises Manager will check and confirm the screen and cameras are working weekly.

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

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6.3 The CFO and DPO will carry out an annual review of the use of CCTV, using the Annual Review Checklist below and send to the DPO for review.

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

6.5 If out of hours emergency maintenance arises, the Headteacher, Site Manager or School Business Officer will be satisfied of the identity and purpose of contractors before allowing entry.

7. Breaches of the Policy (including breaches of security)

7.1 Any breach of this policy by school staff will be initially investigated by the Headteacher / SLT, in order for him/her to take the appropriate disciplinary action.

7.2 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.

8. Complaints

8.1 Any complaints about the schools CCTV system will be addressed to the Headteacher.

8.2 Complaints will be investigated in accordance with the school's Complaints Policy.

9. Access by the Data Subject

9.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to access copies of data held about themselves, including those obtained by CCTV.

9.2 Requests for Data Subject Access will be made in accordance with the Subject Access Request Procedure.

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Annexe 1: CCTV System Annual Review Form (example)

CCTV System Annual Review Form			
Name of School/Trust:			
Name of person completing the review:		**Job title:**	
Signed:		**Date of CCTV review:**	

Review Record	Satisfactory		Problems Identified?	Corrective Action Required / Additional Notes *(if relevant)*
	Yes (✓)	No (×)		
The school is registered with the Information Commissioner's Office and the next renewal date recorded.				
There is a named individual who is responsible for operation of the system.				
The problem we are trying to address has been clearly defined and installing cameras is the best solution.				
The CCTV system is addressing the needs and delivering the benefits that justified its use.				
The nature of processing or surveillance equipment has not changed since the last review.				
Clear procedures and policies are in place for CCTV and are up to date with any changes to the system/processing (eg CCTV Policy, CCTV DPIA, Privacy Notices).				
The system equipment produces clear images which law enforcement agencies e.g. police can use to investigate crime and these can easily be taken from the system when required.				
Cameras have been sited so that they provide clear images.				
Cameras have been positioned to avoid capturing images of people who are not visiting the premises.				
There is sufficient suitable signage notifying people that CCTV monitoring is in operation, including our contact details where it might not be obvious that the system is managed by this				

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Review Record	Satisfactory		Problems Identified?	Corrective Action Required / Additional Notes *(if relevant)*
	Yes (✓)	No (×)		
school.				
Information is available to help deal with queries about operation of the system and how individuals can make access requests.				
Sufficient safeguards are in place to protect wireless transmission systems from interception.				
There are sufficient controls and safeguards in place if the system is connected to, or made available across, a computer, e.g. an intranet.				
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.				
A log is maintained of all access to the system, including names of staff viewing images and whether any images are shared.				
Recorded data will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.				
The process for deleting data is effective and being adhered to.				
Except under the direction of an appropriate public authority (usually police), images will not be provided to third parties, unless the Headteacher has approved the disclosure of the data under the advice of the DPO.				
When information is disclosed, it is transmitted as securely as possible e.g. viewed on school premises, hand delivered/collected in person on a device, a fully tracked postal service etc.				
Staff are trained in security procedures and there are sanctions in place for any misuse of surveillance system information.				
Regular checks are carried out to ensure that the system is				

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Review Record	Satisfactory		Problems Identified?	Corrective Action Required / Additional Notes *(if relevant)*
	Yes (✓)	No (×)		
working properly and produces high quality and useful data.				
There is adequate protection against any cyber security risks or risks in the event of any hardware being lost/stolen.				
There is a system in place to ensure that any manufacturer recommended CCTV system and equipment updates, especially of security software are regularly sought, applied and checked as properly functioning.				

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Annexe 2: CCTV Recorded Image Access Log

(schools may create their own log, using a spreadsheet, or form as convenient)

CCTV Recorded Image Access Log					
Name of School/Trust:					
Authorised member of staff *(name)*	Camera Number / Location	Date & Time of Recording	Reason for viewing *(e.g. vandalism, behaviour incident)*	Further action taken *(e.g. any images / recordings saved / shared?)*	Notes *(e.g. authorisation for sharing / retention period for retained images*

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Annexe 3: CCTV Operator Agreement (example)

CCTV Operator Agreement

People authorised to view the recordings are set out in the CCTV Policy.

I confirm I have read and understood the CCTV Policy and agree to adhere by the rules of the policy as an operator of this system.

In addition, I will update the CCTV Recorded Image Access Log each time I access the system to review a recording. I will:

- record the reason for viewing any images
- detail any retained images, why these were retained and diarise to review saved images for deletion
- I will ensure any retained images are password protected.
- I understand images including retained images must not be shared with third parties, including staff who are not part of the senior leadership team.
- any shared images must have approval for sharing from the Headteacher / SLT.

Agreement

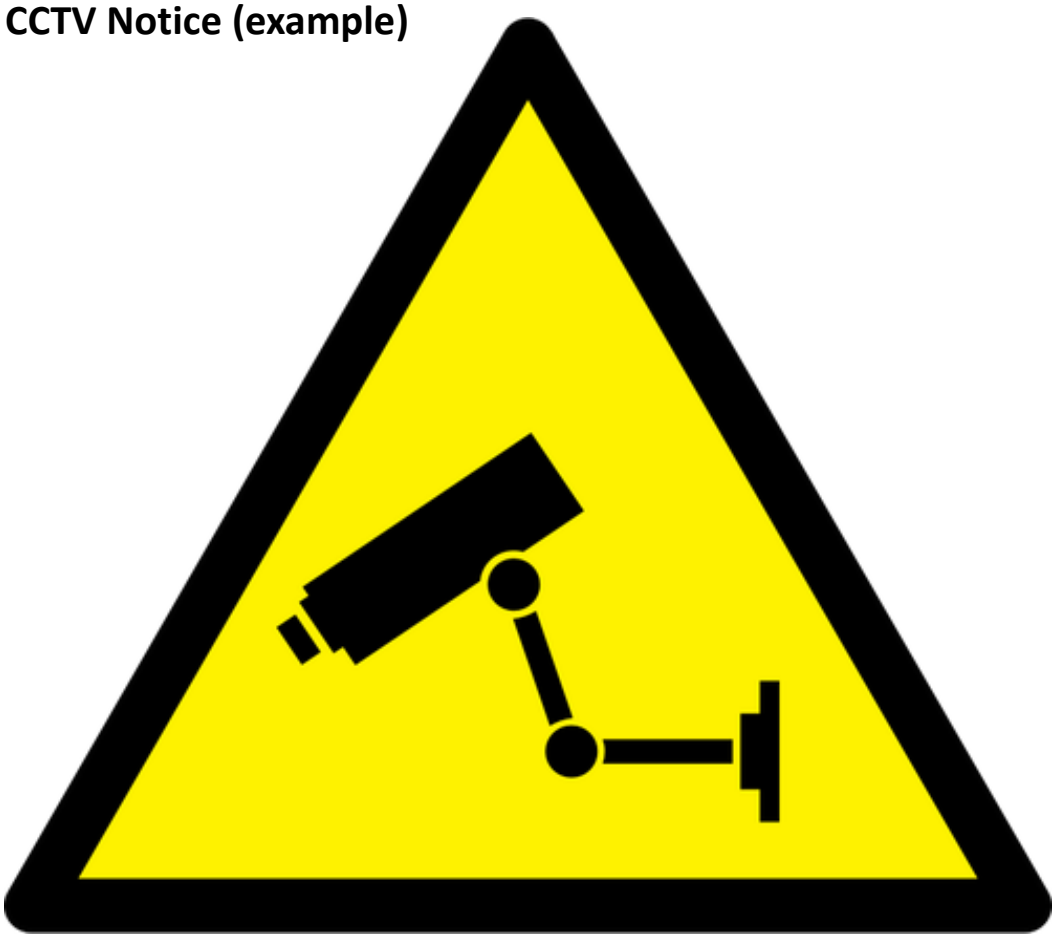
Authorised operator (name):	
Signature:	
Date:	

I confirm that the above-named person is an authorised operator of the CCTV system.

Headteacher (name):	
Signature:	
Date:	

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Annexe 4: CCTV Notice (example)



THESE PREMISES ARE PROTECTED BY 24 HOUR CCTV RECORDING

Images are being monitored for the purpose of public safety, crime prevention, detection and prosecution of offenders.

The scheme is controlled by:

ACE Derbyshire Trust

For further information contact:

THE TRUST OFFICE TEL NO: 01335 342891