

Changes made to the attached policy (November 2024)

1. The policy has been significantly revised and restructured. This work was completed by the Director of IT Services.
2. Consistency has been imposed so that capital letters and hyphenation are more consistent; bullet point lists have been reformatted.
3. A contents page has been added and updated.
4. Inclusive language has been used. Headmaster has been replaced by Headteacher. Where appropriate, reference has been made to the Executive Headteacher.
5. Language has been updated to reflect the organisation of the Trust Board (rather than the previous Governing Body). It is also designed to reflect the multi-school nature of an academy trust.

The NSB Trust

CCTV Policy

To be reviewed annually

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1. Objectives

The Trust recognises that CCTV systems can be privacy intrusive.

Review of this policy shall be repeated regularly and whenever new equipment is introduced, a review will be conducted and a risk assessment put in place. We aim to conduct reviews no later than every two years.

The purpose of the CCTV system is to assist the Trust in reaching the following objectives:

- to protect pupils, staff and visitors against harm to their person and/or property
- to increase a sense of personal safety and reduce the fear of crime
- to protect the Trust buildings and assets
- to support the police in preventing and detecting crime
- to assist in identifying, apprehending and prosecuting offenders
- to assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence; and
- to assist in managing the Trust site (including schools)

2. Purpose of the policy

The purpose of this policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at the Trust sites.

3. Positioning

Locations have been selected, internally, that the Trust reasonably believes to enable each site or school to monitor and address the stated objectives.

Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area, identifying the Trust as the data controller and giving contact details for further information regarding the system.

CCTV cameras are not installed in areas in which individuals would have an expectation of privacy such as toilets and changing facilities.

4. Statement of intent

CCTV cameras are installed in such a way that they are not hidden from view. Signs are predominantly displayed where relevant so that staff, students, visitors and members of the public are made aware that they are entering an area covered by CCTV. The signs also contain contact details as well as a statement of purposes for which CCTV is used.

The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.

The Trust will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

The system has been designed so far as possible to deny observation on adjacent private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design has endeavored to ensure that the system 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.

Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible on the site and make clear who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

CCTV images are not retained for longer than necessary, taking into account the purposes for which they are processed. Data storage is automatically overwritten by the system after a period of 30 days.

Recorded images 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. In the absence of a compelling need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 6 months.

5. System management

Access to the CCTV system and data shall be password protected and will be kept in a secure area.

The CCTV system will be administered and managed by the Information Services Team who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy.

The system and the data collected will only be available to the Systems Manager, his/her replacement and appropriate members of the senior leadership team as determined by the Headteacher.

The CCTV system is designed to be in operation between the hours of or 24 hours each day, every day of the year, though the school does not guarantee that it will be working during these hours.

The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that the cameras are functional.

Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by providing clear, usable images.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

Where a person other than those mentioned above, requests access to the CCTV data or system, the System Manager must satisfy him/herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists, access will be refused.

Details of all visits and visitors will be recorded in a system logbook including time/data of access and details of images viewed and the purpose for so doing.

6. Downloading captured data to other media

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings), any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures:

- each downloaded media must be identified by a unique mark
- before use, each downloaded media must be cleaned of any previous recording
- the System Manager will register the date and time of downloaded media insertion, including its reference

- downloaded media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a downloaded media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store
- if downloaded media is archived, the reference must be noted
- if downloaded media is put onto a device, the device will be encrypted and password protected

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his/her replacement and the Headteacher and other authorised senior leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the downloaded media (and any images contained thereon) remains the property of the school and downloaded media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The Trust also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media, this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the Trust to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until needed by the police.

Applications received from outside bodies (including but not limited to solicitors or parents) to view or release images will be referred to the Trust's Data Protection Officer and a decision made by a senior leader of the Trust or School in consultation with the Trust's Data Protection Officer.

7. Complaints about the use of CCTV

Any complaints in relation to the Trust's CCTV system should be addressed to the Headteacher.

8. Requests for access by the data subject

The Data Protection Act provides data subjects – those whose image has been captured by the CCTV system and can be identified - with a right to access data held about themselves, including those obtained by CCTV. Requests for such data should be made to the Data Protection Officer.

9. Public Information

Copies of this policy will be available to the public from school offices. The NSB Trust recognises that ensuring the Health & Safety of staff, pupils and visitors is essential to the success of its Academies.

We are committed to:

- providing safe and healthy working and learning environments
- preventing accidents and work-related ill health
- meeting our legal responsibilities under Health & Safety legislation as a minimum

- assessing all risks to anyone who could be affected by our curriculum and non-curriculum activities and putting in place measures to control these risks
- ensuring safe working methods and providing safe equipment providing effective information, instruction, training and supervision
- consulting with employees and their representatives/unions on Health & Safety matters
- monitoring and reviewing our safety arrangements and prevention measures to ensure they are effective
- setting targets and objectives to develop a culture of continuous improvement
- ensuring adequate welfare facilities exist throughout the Estate
- ensuring adequate resources are made available for Health & Safety issues, so far as is reasonably practicable

Health and safety management procedures will be adopted, and responsibilities appropriately assigned, to ensure the above commitments can be met. All Trustees, members of the Executive Team, Local Academy Boards, staff, students and visitors will play their part in its implementation.