University Schools Trust
A transformational education

CCTV Policy

March 2022

Title:	CCTV Policy
Procedure Code:	IO3.2
Source:	DPO, TQS & UST
Document Owner:	Director of Data & Compliance
Review & Update By:	Director of Data & Compliance
Advisory Committee:	Audit & Risk Committee
Approval Committee:	Trust Board
Date Approved:	March 2023
Date of Publication:	March 2023
Date of Next Review:	February 2024
Required on Website:	Partial Requirement (Published all)

0. Document Control

The table below contains the changes made between the different final editions of this document set for approval. This is to help provide information to those reviewing and approving the document of the changes being made.

Document Edition	Section	Details of change
March 2023	None	No updates
August 2022	All	Update to new brand
February 2022	Title 1 5.2 ALL	Updated reference code Update definitions to add "Trust" and amend "Pupil" in line with standard Added requriement for support of the local DP lead regarding resources to esnure complaince. Reference to previous EU GDPR has been replaced by UK GDPR

Contents

1. Definitions

The "Trust" refers to the company known as the University Schools Trust, East London and all Trustees, Governors and Staff who work within it.

A "School" refers to an individual academy within the Trust, as denoted by their Unique Reference Number. As such a 'school' may span one or several phases of education to the individual academies within the Trust. Depending on the context the term "School" may refer to a singular academy or to all of the academies within the Trust but as separate entities.

"Staff" refers to any individual who is employed by the Trust or who operates on the Trust's behalf, e.g. Trustees and Governors.

A "Parent" includes the natural or adoptive parent of a pupil as well as any non-parent / carer who has parental responsibility including being involved in the day-to-day care of a pupil.

A "Pupil" includes any incoming or current pupil at any School within the Trust. It also includes any individual who was previously a pupil at any School within the Trust and who has left within the appropriate timeframe for consideration as necessary, e.g. complaints. The term pupil is used as standard by the UST in its policy documents but can be replaced with the term "student" or "child" with no change of definition.

The "Headteacher" is defined as the individual who has ultimate responsibility for a school in line with UST strategy, approach, ethos and values. Individual schools may have alternative titles for this position such as Executive Headteacher or Principal.

2. Scope of the Policy

This policy applies to all individuals within and around the school premises.

3. Policy Aims and Ethos

The purpose of this policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system across the entirety of the UST.

The UST uses CCTV for the purposes of;

- protecting the Trust buildings and their assets;
- increasing personal safety and to reduce the fear of crime;
- supporting the police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders;
- protecting members of the public and private property; and
- assisting in managing the school. This includes, but not as an exhaustive list;
    - reviewing reported or suspected incidents relating to the conduct of individuals; and
    - protecting the safety and wellbeing of individuals within the school community.

4. Links to Legislation and Guidance Documents

4.1. Relevant Internal Policies

This policy should be read in conjunction with the following policies;

- GDPR and FOI Policy
- Cookies Policy

4.2. Relevant External Documents

This policy has been created using the following external documents;

- UK General Data Protection Regulations (UK GDPR)
- The Information Commissioner's Office (ICO) Guide to the GDPR
- The Information Commissioner's Office (ICO) Guidance on CCTV

5. Roles and Responsibilities

5.1. Trust Board

The Trust Board;

- has responsibility for the content of this policy;
- has responsibility for ensuring that the policy is adhered to through delegated means;
- will review the policy in line with agreed period of review; and
- will ensure, through the DPO and the Policy Compliance Lead (PCL), that the policy is compliant with the regulations set out in the section above and that it reflects any changes as and when they occur.

5.2. Headteacher / Trust Leader

The Headteacher / Trust Leader will;

- appoint a Designated Policy Lead / Policy Compliance Lead from among the senior staff;
- ensure that the requirements of this policy are adhered to;
- ensure that all staff receive policies as required;
- ensure that all staff have access to all school and trust policies; and
- ensure that the local Data Protection Lead has sufficient support to ensure compliance with respect to CCTV usage including appropriate signage.

5.3. Policy Compliance Lead

The PCL is a Trust member of staff and will, as part of their role;

- ensure that this policy is distributed to the individual locations;
- ensure that all Trust staff are aware of the policy (including further revised editions); and
- make all necessary amendments to the policy following guidance from the DPO to ensure that it remains compliant with the aforementioned regulations.

5.4. Designated Policy Lead

A DPL is a school-based member of staff in each school and will, as part of their role;

- ensure an accurate copy of this policy is available to all staff;
- disseminate updates regarding this and associated policies in a timely manner; and

- provide advice and guidance regarding the development of policies at the school level.

5.5. Senior Leadership Team / UST Executive

The Senior Leadership Team (SLT) / UST Executive will;

- use the CCTV resource only for the circumstances outlined in the policy aims;
- authorise the use of CCTV by other staff members only for the circumstances outlined in the policy aims; and
- communicate directly with the CCTV Operator regarding the nature and scope of any authorised use either by themselves or through delegated persons.

5.6. CCTV Operator

The CCTV Operator may be an employed member of staff, an employee of an on-site contractor or an employee of an off-site contractor. The CCTV Operator will;

- use the CCTV if authorisation has been provided by the appropriate members of staff;
- use the CCTV without direct authorisation if there is an immediate response required;
- not direct CCTV at specific individuals or groups unless an immediate response is required;
- record details regarding all usage of the CCTV system; and
- record details regarding all images and / or video copied from the system.

6. CCTV Requirements

The CCTV Scheme will be registered with the Information Commissioner under the terms of the UK General Data Protection Regulations and will seek to comply with the requirements of the 2018 Data Protection Act, UK GDPR and the Commissioner's Code of Practice.

The school will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act. Cameras will be used to monitor activities within and surrounding the Trust's estates to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of those within the Trust, together with its visitors. This includes in regard to the day-to-day operations and management of the Trust and its schools as outlined throughout this policy.

Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property. Unless an immediate response to events is required, staff including those with delegated responsibility by the Trust, must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. CCTV data will only be released for use in the investigation of a specific crime with the written authority of the police. 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.

7. Control Room

The control room, where the CCTV monitors are viewed, must be a secure location which does not allow for the viewing of the monitors without authorisation. Access to the room will be limited so that the CCTV Operator and / or a senior member of staff (as outlined above) must be present if other members of staff are in the room.

8. Recording CCTV Usage

Each occasion of specific use of the CCTV system must be recorded in a CCTV Log. The details recorded must include;

- the date and time that the system is used;
- the person operating the system;
- the person who has authorised the usage;
- the person who is viewing the CCTV images (if different from above);
- the time and date of the images being viewed; and
- the reason for the CCTV usage.

If the images are downloaded the following additional information must be recorded;

- the type of CCTV data downloaded (image / video);
- the person(s) receiving the CCTV data;
- the unique reference number of the CCTV data download; and
- the date at which the data needs to be deleted.

9. CCTV Data Retention

The standard data retention of CCTV images is 28 days at which point the system will automatically delete data that has not been downloaded. Downloaded data will be kept for no longer than is required in order to fulfil the requirements of the data process. If the information is required by a third party such as the police, then the data will fall under the third party's data retention policy.

10. Approval Signature

Signature of (enter position e.g. Chair) _____

Print name _____

Date _____