

	AAT CCTV Policy	
	Last reviewed: October 2023	Next Review: October 2024

1 INTRODUCTION

Alban Academies Trust uses Close Circuit Television (“CCTV”) within the Trust premises. The purpose of this policy is to set out the position of the Trust as to the management, operation and use of the CCTV at AAT.

This policy applies to all members of our workforce, visitors to AAT premises and other persons whose images may be captured by the CCTV system.

This policy takes account of all applicable legislation and guidance, including:

- UK General Data Protection Regulation (“UK GDPR”)
- Data Protection Act 2018 (together the Data Protection Legislation)
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998
- Freedom of Information Act 2000

This policy sets out the position of Alban Academies Trust in relation to its use of CCTV.

2 PURPOSE AND INTENT

Alban Academies Trust uses CCTV for the following reasons:

- To ensure a safe and secure environment for pupils, staff and visitors is provided
- In the event of internal disciplinary proceedings, grievance procedures or complaints in relation to the provision of a safe and secure environment, footage may be used as evidence subject to confidentiality requirements and procedures.
- Reducing the occurrence of vandalism, bullying, anti-social behavior and site incursion
- Enabling a faster and more effective resolution to incidents in identifying persons who have committed a breach of Trust/School rules.
- Safeguarding students through visible location checks during the school day.
- To prevent the loss of or damage to Alban Academies Trust buildings and assets.
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.

3 SYSTEM

Please see annexes 1-7 below for details of the CCTV systems at our Trust sites.

4 CCTV PLACEMENTS

All CCTV cameras will be situated and located to meet the purpose for which the CCTV is operated. Cameras will be placed in prominent positions where they are clearly visible to all individuals on site. Cameras will not be placed in locations to record areas that are not intended to be the subject of surveillance unless justifiable. Please see annexes 1-7 below for details of the CCTV camera placements at our Trust sites.

Alban Academies Trust will make all reasonable efforts to ensure that areas outside of AAT premises are not recorded, particularly in relation to site entrances and boundaries.

Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.

5 PRIVACY IMPACT ASSESSMENT

Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by Alban Academies Trust to ensure that any planned and proposed installation is compliant with legislation and ICO guidance, which can be found [HERE](#).

Alban Academies Trust will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera, to avoid recording and storing excessive amounts of personal data when possible.

6 MANAGEMENT AND SYSTEM ACCESS

The CCTV system will be managed and maintained by the AAT Digital infrastructure Lead. Please see below annexes for a description and details of the management and access of the CCTV systems at each of our Trust sites.

7 STORAGE AND RETENTION

All footage recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded. Footage will be stored for a period of 14 days, unless there is a specific purpose or warranted reason for which footage may be retained for a longer period.

All footage exported by the CCTV system will be stored in a secure location only accessible by staff who have required permissions and/or related to their role. Exported footage will only be kept for as long as necessary and for the purpose for which this was originally exported for. Exported footage may be stored for up to a maximum period of 7 years where there is a specific purpose or warranted reason for which footage needs to be retained for a longer period.

The CCTV system will operate 24 hours each day, every day of the year, recording all activity in the areas covered. Cameras will be used to monitor activities within the school to identify adverse activity actually occurring, anticipated or perceived, and for the purpose of securing the safety and wellbeing of the school's pupils and staff, together with its visitors. At no time will a camera be directed to follow or track an individual. Materials or knowledge secured as a result of CCTV use will not be used for any commercial or media purpose.

Alban Academies Trust will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

- CCTV systems will be located in secure and restricted access areas
- The CCTV system will be password protected
- The ability to download footage will be restricted to specific members of staff
- Downloaded copies of footage may be stored in a secure location on the school network, with access restrictions and protections in place to only designated members of staff.
- In the event of exported recordings for external agencies, such as the police, files will be encrypted.

8 DISCLOSURE OF IMAGES TO DATA SUBJECTS

Any individual recorded in any CCTV footage is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images. Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation.

Requests by individual data subjects for images relating to themselves will be treated as a 'Subject Access Request' and should be submitted in writing to the Data Protection Officer (DPO) together with proof of identification.

When such a request is made the central AAT IT Team will review the CCTV footage, in respect of relevant time periods where appropriate and in accordance with the request. If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only footage of the individual making the request. The central AAT IT Team must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals then Alban Academies Trust must consider whether:

- The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals.
- The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained.
- If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

A record must be kept, and held securely, of all disclosures which sets out:

- When a request was made
- The process followed by the central AAT IT Team in determining whether the images contained third parties
- The considerations as to whether to allow access to those images
- The individuals that were permitted to view the images and when
- Whether a copy of the footage was provided, and if so to whom, when and in what format

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by Alban Academies Trust / the relevant school. This can be found in Appendix 1.

9 DISCLOSURE OF IMAGES TO THIRD PARTIES

Alban Academies Trust will only disclose recorded CCTV footage to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place. If a request is received from a law enforcement agency for disclosure of CCTV images then the central AAT IT Team must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images. The information above must be recorded in relation to any disclosure.

If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

CCTV images may be disclosed to review panel members as part of an internal disciplinary proceeding, grievance procedure or complaint. CCTV images may be disclosed to members of an Independent Review Panel in support of school exclusions, as part of providing a safe and secure environment for pupils, staff and visitors.

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by Alban Academies Trust / the relevant school. This can be found in Appendix 1.

10 POLICY & CCTV SYSTEM REVIEW

This policy will be reviewed annually with reference to relevant legislation or guidance in effect at the time. Each school within the Trust carries out an internal assessment annually to evaluate the usage and effectiveness of their CCTV system. The CCTV system and the privacy impact assessment relating to it will also be reviewed annually.

11 IMPROPER CCTV USAGE

The improper use of CCTV systems could constitute a criminal offense. Any member of staff who breaches this policy may be subject to disciplinary action.

12 COMPLAINTS

Any complaints relating to this policy or to the CCTV system operated by Alban Academies Trust should be made in accordance with the Trust's Complaints Policy.

Complaints concerning one of the Trust's Schools use of its CCTV system or the disclosure of CCTV images should be made in writing to one of the following members of AAT staff:

Luke Harman

AAT Director of IT

harmanl@aat.school

James Belmont

AAT Digital Infrastructure Lead

belmontj@aat.school

13 TWELVE GUIDANCE PRINCIPLES

The Surveillance Camera Code of Practice sets out the following 12 guiding principles for surveillance cameras in public places:

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.

11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

14 CCTV PRIVACY NOTICE

Closed circuit television is installed and operated at Schools within the Trust for security and health and safety purposes. Images from the installed cameras may be viewed and recorded. This privacy notice explains what personal information is collected, what it is used for and who it is provided to. The notice also describes why we require your data, and the legal basis on which we do this. This privacy notice relates to our CCTV System, including, but not limited to, where it has been installed on the outside of some of our buildings. It provides additional information that specifically relates to this particular service, and should be read together with our general privacy notice.

What personal information does this service use?

The CCTV system captures images of people and vehicles in and around where a camera is located. Where fixed CCTV cameras are operating, there will be signs clearly displayed.

Images captured by CCTV will not be kept for longer than 14 days. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated.

What is your personal information used for?

We use your personal data for the following reasons:

- a) To increase personal safety of pupils, staff and visitors, and reduce the fear of crime
- b) To protect the school buildings and their assets
- c) To support the Police in a bid to deter and detect crime
- d) To assist in identifying, apprehending and potentially prosecuting offenders
- e) To protect members of the public and private property
- f) To assist in managing the school

What is the lawful basis we are relying on?

We collect and use this information to ensure the school can undertake its remit to educate children ensuring personal safety of pupils, staff and visitors, protecting school buildings and its assets and to assist in managing the school (Article 6(1)(e) of the General Data Protection Regulation).

The school will use the 'Passport to Compliance', issued by the Surveillance Camera Commissioner to ensure that the surveillance camera system complies with the Guiding Principles set out in the Surveillance Camera Code of Practice published by the Home Office as a requirement of the Protection of Freedoms Act 2012.

Where has your personal information come from?

The images are captured because you are present in the area which is covered by the CCTV system.

Who will we share your personal information with?

Your personal data is shared securely with the following, where it is both necessary and appropriate to do so:

- Relevant staff within the school
- Our local authority
- The Police

How long will we keep your information?

Our retention schedule sets out how long we keep personal information for and is available on request.

Your personal information and your rights

To read about what rights you have regarding the personal information used for this service, please see our general privacy notice.

Updates

We may change this privacy notice from time to time.

If you have any questions or concerns about how we use your personal information, please contact the school office.

You also have the right to complain to the Information Commissioner's Office if you're unhappy about how we process your information.

ANNEX 1

CCTV AT SANDRINGHAM SCHOOL

The CCTV system consists of **50no** cameras, which are streamed to and recorded on a central Network Video Recorder. Sound is not recorded.

Camera details:

- **0no** cameras are of the pan/tilt/zoom type, **50no** are fixed.
- Live images from all CCTV cameras are live streamed to a monitoring station in the AAT IT/Network Support Office & Deputy Headteachers Office which is a restricted access location.
- The Site Manager has secure access to the CCTV system via a school owned device, which allows them access to live and recorded images during periods of school closure.
- On a day to day basis the main CCTV system will be operated and managed by the central AAT IT Team.
- The Gate Entry system will be operated by receptionists, school admin staff and IT/Network support.
- The viewing of live CCTV images will be restricted to the central AAT IT Team, Site Team and SLT.
- Recorded footage which is stored on the CCTV system will be restricted to access by the central AAT IT Team, Site Team and SLT.
- Other school staff may view recorded footage only on the direction of the Headteacher, Deputy Headteachers or a member of the Senior Leadership Team.
- Secure access to the CCTV system is restricted to the AAT IT Team, Site Team and SLT, and only via a school owned device.
- This is used to access live and recorded footage during periods when the school is closed.
- No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- The CCTV system is checked daily by the central AAT IT Team to ensure that it is operating effectively.
- CCTV footage may be disclosed to Governors/Trustees as part of an internal disciplinary proceeding, grievance procedure or complaint.

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by Sandringham School.

CCTV Locations:

The system comprises a number of fixed cameras located within the school grounds.

25no cameras are located around corridors of school buildings

5no cameras are located in classrooms

1no camera is located in the school reception area

19no additional cameras are located around the perimeter of the building

ANNEX 2

CCTV AT RIDGEWAY ACADEMY

The CCTV system consists of **70no** cameras, which are streamed to and recorded on a central Network Video Recorder. Sound is not recorded.

Camera details:

- **1no** cameras are of the pan/tilt/zoom type, **69no** are fixed.
- Live images from all CCTV cameras are live streamed to a monitoring station in the IT Office & Site Teams Office which is a restricted access location.
- The Site Team has secure access to the CCTV system via a school owned device, which allows them access to live and recorded images during periods of school closure.
- On a day to day basis the main CCTV system will be operated and managed by the central AAT IT Team.
- The Gate Entry system will be operated by receptionists, school admin staff and IT/Network support.
- The viewing of live CCTV images will be restricted to the central AAT IT Team, Site Team and SLT.
- Recorded footage which is stored on the CCTV system will be restricted to access by the central AAT IT Team, Site Team and SLT.
- Other school staff may view recorded footage only on the direction of the Headteacher, Deputy Headteachers or a member of the Senior Leadership Team.
- Secure access to the CCTV system is restricted to the AAT IT Team, and only via a school owned device.
- This is used to access live and recorded footage during periods when the school is closed.
- No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- The CCTV system is checked daily by the central AAT IT Team to ensure that it is operating effectively.
- CCTV footage may be disclosed to Governors/Trustees as part of an internal disciplinary proceeding, grievance procedure or complaint.

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by Ridgeway Academy.

CCTV Locations:

The system comprises a number of fixed cameras located within the school grounds.

19no cameras are located around corridors of school buildings

10no cameras are located in classrooms

1no camera is located in the school reception area

40no additional cameras are located around the perimeter of the building

ANNEX 3

CCTV AT VERULAM SCHOOL

The CCTV system consists of **64no** cameras, which are streamed to and recorded on a central Network Video Recorder. Sound is not recorded.

Camera details:

- **2no** cameras are of the pan/tilt/zoom type, **62no** are fixed.
- Live images from all CCTV cameras are live streamed to a monitoring station in the IT Office & Site Teams Office which is a restricted access location.
- The Site Team has secure access to the CCTV system via a school owned device, which allows them access to live and recorded images during periods of school closure.
- On a day to day basis the main CCTV system will be operated and managed by the central AAT IT Team.
- The Gate Entry system will be operated by receptionists, school admin staff and IT/Network support.
- The viewing of live CCTV images will be restricted to the central AAT IT Team, Site Team and SLT.
- Recorded footage which is stored on the CCTV system will be restricted to access by the central AAT IT Team, Site Team and SLT.
- Other school staff may view recorded footage only on the direction of the Headteacher, Deputy Headteachers or a member of the Senior Leadership Team.
- Secure access to the CCTV system is restricted to the AAT IT Team, Site Team and SLT, only via a school owned device.
- This is used to access live and recorded footage during periods when the school is closed.
- No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- The CCTV system is checked daily by the central AAT IT Team to ensure that it is operating effectively.
- CCTV footage may be disclosed to Governors/Trustees as part of an internal disciplinary proceeding, grievance procedure or complaint.

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by Verulam School.

CCTV Locations:

The system comprises a number of fixed cameras located within the school grounds.

24no cameras are located around corridors of the main building

10no cameras are located around corridors of school buildings

5no cameras are located in classrooms

3no cameras are located in the school reception areas

22no cameras are located around the perimeter of the building

ANNEX 4

CCTV AT GARDEN FIELDS JMI SCHOOL

The CCTV system consists of **19no** cameras, which are streamed to and recorded on a central Network Video Recorder. Sound is not recorded.

Camera details:

- **2no** cameras are of the pan/tilt/zoom type, **17no** are fixed.
- Live images from all CCTV cameras are live streamed to a monitoring station in the Reception and Headteacher's Office which is a restricted access location.
- The Site Manager has secure access to the CCTV system via a school owned device, which allows them access to live and recorded images during periods of school closure.
- On a day to day basis the main CCTV system will be operated and managed by the central AAT IT Team.
- The Gate Entry system will be operated by receptionists, school admin staff and IT/Network support.
- The viewing of live CCTV images will be restricted to the central AAT IT Team, Site Team and SLT.
- Recorded footage which is stored on the CCTV system will be restricted to access by the central AAT IT Team, Site Team and SLT.
- Other school staff may view recorded footage only on the direction of the Headteacher, Deputy Headteachers or a member of the Senior Leadership Team.
- Secure access to the CCTV system is restricted to AAT IT Team, Site Team and SLT, and only via a school owned device.
- This is used to access live and recorded footage during periods when the school is closed.
- No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- The CCTV system is checked daily by the central AAT IT Team to ensure that it is operating effectively.
- CCTV footage may be disclosed to Governors/Trustees as part of an internal disciplinary proceeding, grievance procedure or complaint.

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by Gardenfields JMI School.

CCTV Locations:

The system comprises a number of fixed cameras located within the school grounds.

19no additional cameras are located around the perimeter of the building

ANNEX 5

CCTV AT SKYSWOOD PRIMARY & NURSERY SCHOOL

The CCTV system consists of **7no** cameras, which are streamed to and recorded on a central Network Video Recorder. Sound is not recorded.

Camera details:

- **Ono** cameras are of the pan/tilt/zoom type, **7no** are fixed.
- Live images from all CCTV cameras are live streamed to a monitoring station in the Reception Office which is a restricted access location.
- The Site Manager has secure access to the CCTV system via a school owned device, which allows them access to live and recorded images during periods of school closure.
- On a day to day basis the main CCTV system will be operated and managed by the central AAT IT Team.
- The Gate Entry system will be operated by receptionists, school admin staff and IT/Network support.
- The viewing of live CCTV images will be restricted to the central AAT IT Team, Site Team and SLT.
- Recorded footage which is stored on the CCTV system will be restricted to access by the central AAT IT Team, Site Team and SLT
- Other school staff may view recorded footage only on the direction of the Headteacher, Deputy Headteachers or a member of the Senior Leadership Team.
- Secure access to the CCTV system is restricted to AAT IT Team, Site Team and SLT, and only via a school owned device.
- This is used to access live and recorded footage during periods when the school is closed.
- No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- The CCTV system is checked daily by the central AAT IT Team to ensure that it is operating effectively.
- CCTV footage may be disclosed to Governors/Trustees as part of an internal disciplinary proceeding, grievance procedure or complaint.

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by Skyswood Primary School.

CCTV Locations:

The system comprises a number of fixed cameras located within the school grounds.

7no additional cameras are located around the perimeter of the building

ANNEX 6

CCTV AT WHEATFIELDS INFANTS' & NURSERY SCHOOL

The CCTV system consists of **11no** cameras, which are streamed to and recorded on a central Network Video Recorder. Sound is not recorded.

Camera details:

- **0no** cameras are of the pan/tilt/zoom type, **11no** are fixed.
- Live images from all CCTV cameras are live streamed to a monitoring station in the Reception and Headteacher's Office which is a restricted access location.
- The Site Manager has secure access to the CCTV system via a school owned device, which allows them access to live and recorded images during periods of school closure.
- On a day to day basis the main CCTV system will be operated and managed by the central AAT IT Team.
- The Gate Entry system will be operated by receptionists, school admin staff and IT/Network support.
- The viewing of live CCTV images will be restricted to the central AAT IT Team, Site Team and SLT.
- Recorded footage which is stored on the CCTV system will be restricted to access by the central AAT IT Team, Site Team and SLT.
- Other school staff may view recorded footage only on the direction of the Headteacher, Deputy Headteachers or a member of the Senior Leadership Team.
- Secure access to the CCTV system is restricted to AAT IT Team, Site Team and SLT, and only via a school owned device.
- This is used to access live and recorded footage during periods when the school is closed.
- No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- The CCTV system is checked daily by the central AAT IT Team to ensure that it is operating effectively.
- CCTV footage may be disclosed to Governors/Trustees as part of an internal disciplinary proceeding, grievance procedure or complaint.

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by Wheatfields Junior school.

CCTV Locations:

The system comprises a number of fixed cameras located within the school grounds.

1no camera located in outside classroom/s

10no additional cameras are located around the perimeter of the building

ANNEX 7

CCTV AT WHEATFIELDS JUNIOR SCHOOL

The CCTV system consists of **9no** cameras, which are streamed to and recorded on a central Network Video Recorder. Sound is not recorded.

Camera details:

- **0no** cameras are of the pan/tilt/zoom type, **9no** are fixed.
- Live images from all CCTV cameras are live streamed to a monitoring station in the Reception and Headteacher's Office which is a restricted access location.
- The Site Manager has secure access to the CCTV system via a school owned device, which allows them access to live and recorded images during periods of school closure.
- On a day to day basis the main CCTV system will be operated and managed by the central AAT IT Team.
- The Gate Entry system will be operated by receptionists, school admin staff and IT/Network support.
- The viewing of live CCTV images will be restricted to the central AAT IT Team, Site Team and SLT.
- Recorded footage which is stored on the CCTV system will be restricted to access by the central AAT IT Team, Site Team and SLT.
- Other school staff may view recorded footage only on the direction of the Headteacher, Deputy Headteachers or a member of the Senior Leadership Team.
- Secure access to the CCTV system is restricted to AAT IT Team, Site Team and SLT, and only via a school owned device.
- This is used to access live and recorded footage during periods when the school is closed.
- No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- The CCTV system is checked daily by the central AAT IT Team to ensure that it is operating effectively.
- CCTV footage may be disclosed to Governors/Trustees as part of an internal disciplinary proceeding, grievance procedure or complaint.

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by Wheatfields Junior & Infants School.

CCTV Locations:

The system comprises a number of fixed cameras located within the school grounds.

9no additional cameras are located around the perimeter of the building

APPENDIX 1

<SCHOOL NAME> CCTV ACCESS LOG			
Date	Time	Name	Purpose for Access