



# Inspire Education Trust

Together we achieve, individually we grow

## CTV Policy

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**Policy Date:** June 2024

**Review Date:** June 2026

## Document History

Version	Status	Date	Author	Summary Changes
V1		January 2022	Paul Hewitt	
V2		August 2023	Martin Dorrington	Added additional purpose for using CCTV. Updated annexes to reflect changes in cameras.
V2.1		December 2023	Martin Dorrington	Updated Annex 1 to reflect addition of new cameras
V2.2		June 2024	Martin Dorrington	Clarification of section 7.2 amended from saying 28 days to saying 'up to 28 days' Updated Annex 2 to include new schools.

## 1 Policy Statement

- 1.1 Inspire Education 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 Inspire Education Trust.
- 1.2 This policy applies to all members of our Workforce, visitors to Inspire Education Trust premises and all other persons whose images may be captured by the CCTV system.
- 1.3 This policy takes account of all applicable legislation and guidance, including:
  - 1.3.1 UK General Data Protection Regulation (“UK GDPR”)
  - 1.3.2 Data Protection Act 2018 (together the Data Protection Legislation)
  - 1.3.3 CCTV Code of Practice produced by the Information Commissioner
  - 1.3.4 Human Rights Act 1998
- 1.4 This policy sets out the position of Inspire Education Trust in relation to its use of CCTV.

## 2 Purpose of CCTV

- 2.1 Inspire Education Trust uses CCTV for the following purposes:
  - 2.1.1 To provide a safe and secure environment for pupils, staff and visitors.
  - 2.1.2 Footage may be used as evidence during internal disciplinary proceedings, grievance procedures or complaints where related to the provision of such a safe and secure environment, subject to the usual confidentiality requirements of those procedures.
  - 2.1.3 To prevent the loss of or damage to Inspire Education Trust buildings and/or assets
  - 2.1.4 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.
  - 2.1.5 To provide evidence in case of disputes with contractors & other third parties.

## 3 Description of system

- 3.1 Please refer to the annexes below for a description of the CCTV systems at our different sites.

## 4 Siting of Cameras

- 4.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.
- 4.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. Inspire Education Trust will make all reasonable efforts to ensure that areas outside of Inspire Education Trust premises are not recorded.

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

4.4 Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.

## **5 Privacy Impact Assessment**

5.1 Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by Inspire Education Trust to ensure that the proposed installation is compliant with legislation and ICO guidance.

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

## **6 Management and Access**

6.1 The CCTV system will be managed by the ICT Strategic Network Manager.

6.2 Please refer to the annexes below for a description of the management and access of the CCTV systems at our different sites.

## **7 Storage and Retention of Images**

7.1 Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

7.2 Recorded images are stored only for a period of up to 28 days unless there is a specific purpose for which they are retained for a longer period.

7.3 Inspire Education 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:

7.3.1 CCTV recording systems being located in restricted access areas ;

7.3.2 The CCTV system being password protected;

7.3.3 Restriction of the ability to make copies to specified members of staff

7.3.4 Extracted copies of footage may be stored in a secure location on the school network, and subject to access restrictions and protections. In cases where school equipment is only capable of extracting footage to removeable media such as a CD-R, contents of said media will be copied to a secure location on the school network and the removeable media destroyed.

7.3.5 Exported recordings for the police are encrypted

7.4 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 Inspire Education Trust / the relevant school.

7.5 Recorded images will be deleted in accordance with clause 7.2.

## **8 Disclosure of Images to Data Subjects**

8.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.

8.2 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. Such a request should be considered in the context of Inspire Education Trust's Subject Access Request Policy.

8.3 When such a request is made the ICT Support department will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

8.4 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 images of the individual making the request. The ICT Support department must take appropriate measures to ensure that the footage is restricted in this way.

8.5 If the footage contains images of other individuals then Inspire Education Trust must consider whether:

8.5.1 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;

8.5.2 The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or

8.5.3 If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

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

8.6.1 When the request was made;

8.6.2 The process followed the ICT Support department in determining whether the images contained third parties;

8.6.3 The considerations as to whether to allow access to those images;

8.6.4 The individuals that were permitted to view the images and when; and

8.6.5 Whether a copy of the images was provided, and if so to whom, when and in what format.

## **9 Disclosure of Images to Third Parties**

9.1 Inspire Education Trust will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

9.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

9.3 If a request is received from a law enforcement agency for disclosure of CCTV images then the ICT Support department 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.

9.4 The information above must be recorded in relation to any disclosure.

9.5 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.

9.6 CCTV images may be disclosed to review panel members as part of an internal disciplinary proceeding, grievance procedure or complaint. All such access will be logged.

9.7 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. All such access will be logged.

## **10 Review of Policy and CCTV System**

10.1 This policy will be reviewed bi-annually.

10.2 The CCTV system and the privacy impact assessment relating to it will be reviewed bi-annually.

## **11 Misuse of CCTV systems**

11.1 The misuse of CCTV system could constitute a criminal offence.

11.2 Any member of staff who breaches this policy may be subject to disciplinary action.

## **12 Complaints relating to this policy**

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

## Responsibility

The Inspire Education Trust Board of Directors have a responsibility for the oversight of this and all policies within the Trust's academies and may delegate the implementation and review of this policy in accordance with our Scheme of Delegation.

## Annex 1 CCTV at Blue Coat Church of England School and Music College

The CCTV system consists of 90 cameras, which are streamed to and recorded on a central server. Sound is not recorded. Two cameras are of the pan/tilt/zoom type, others are fixed.

Three of the CCTV cameras form part of the Gate Entry system and live stream images to Reception. Visitors can press a button to speak with staff to request access to the site.

Two of the CCTV cameras are positioned in the washrooms outside of toilets. These toilets have floor to ceiling doors, and the camera in the washroom is not pointed directly at the toilets in order to maintain privacy and comply with section 4.4 of this policy.

Live images from all CCTV cameras are live streamed to a monitoring station in the Site Services Office, which is a restricted access location.

The Site Manager has secure remote 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 by the ICT Support department. The Gate Entry system will be operated by receptionists and school admin staff.

The viewing of live CCTV images will be restricted to ICT Support staff and Site Services Officers, however viewing of the gate entry cameras will be performed by Reception staff so that they authorise access to visitors.

Recorded images which are stored by the CCTV system will be restricted to access by the ICT Support department, Site Services Officers, Pastoral Leaders, Pastoral Assistants and the Senior Leadership Team. Other school staff may view recorded footage only on the direction of the Headteacher, Deputy Headteachers or a member of the Executive Leadership Team.

Secure remote access to the CCTV system is restricted to the Site Manager, 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 ICT Support department to ensure that it is operating effectively.

CCTV images may be disclosed to Governors as part of an internal disciplinary proceeding, grievance procedure or complaint. All such access will be logged.



## **Annex 2 CCTV at Arley Primary Academy, Clifford Bridge Academy, Frederick Bird Academy, Hearsall Community Academy, Stockingford Academy, Whittle Academy and Walsgrave CofE Academy**

Each school's CCTV system consists of 2 cameras, which are streamed to and recorded on a central server. Sound is not recorded. All cameras are of a fixed type.

The two CCTV cameras monitor the public entrance to the school and reception waiting area.

Live images from all CCTV cameras are live streamed to a monitoring station in the Site Services Office, which is a restricted access location.

The Site Manager has secure remote 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 by the ICT Support department. Site services also have access if required.

The viewing of live CCTV images will be restricted to ICT Support staff, Site Services Officers and the Office Manager.

Recorded images which are stored by the CCTV system will be restricted to access by the ICT Support department, Site Services Officers, Pastoral Leaders, Pastoral Assistants and the Senior Leadership Team. Other school staff may view recorded footage only on the direction of the Headteacher, Deputy Headteachers or a member of the Executive Leadership Team.

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 ICT Support department to ensure that it is operating effectively.

CCTV images may be disclosed to Governors as part of an internal disciplinary proceeding, grievance procedure or complaint. All such access will be logged.

Reviewed by:

Martin Dorrington  
Martin Dorrington

December 2023  
June 2024

Next Review Date:

June 2026

Approved by Directors:

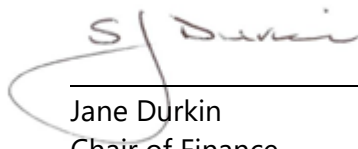
14 October 2024

Signed:



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Lois Whitehouse  
CEO



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Jane Durkin  
Chair of Finance