



CCTV Policy

1. Introduction

- 1.1 CCTV policy between Bedford Education Partnership (BEP), Galliford Try Facilities Management (GTFM) Central Bedfordshire Council (CBC) and Samuel Whitbread Academy(the School)
- 1.2 The purpose of this procedure is to regulate the management, operation and use of the closed-circuit television (CCTV) system at Samuel Whitbread Academy, hereafter referred to as 'the School'.
- 1.3 The system comprises of approximately 85 cameras located around the external and internal areas of the school building. These are part of the PFI building / asset security system owned by BEP and maintained by GTFM.
- 1.4 The CCTV system is maintained by Security on behalf of GTFM, who are the Data Controller on behalf of BEP.
- 1.5 All images are only available to the Data Controller and approved persons nominated by the School.
- 1.6 This Procedure follows Data Protection Act guidelines.
- 1.7 All PFI project staff, School staff and unions will be made aware of this procedure.

2. Objectives of the CCTV scheme

- 2.1 To provide video monitoring for the security of the building and act as a visual deterrent to potential vandalism and criminal activity.
- 2.2 To support the Police in a bid to deter and detect crime where appropriate.
- 2.3 To assist in identifying, apprehending, and prosecuting offenders where appropriate.
- 2.4 To assist in the investigation of serious and/or gross misconduct, and or issues of safeguarding.

3. Statement of Intent

- 3.1 The CCTV Scheme will be registered with the Information Commissioner's Office (ICO) under the terms of the Data Protection Act 2018 / UK GDPR. The Data Controller will seek to comply with the requirements both of the Data Protection Act and the ICO Code of Practice.
- 3.2 BEP, GTFM and the School will treat the system and all related information, documents and recordings as data which is protected by the Act.
- 3.3 The CCTV system will be used to monitor activities within the site to identify criminal or inappropriate activity.
- 3.4 The Data Controller and approved persons will not use CCTV for monitoring the work of BEST employees, or finding out whether or not they are complying with the organisation's policies and procedures.
- 3.5 Any viewing of images of Students via the CCTV will be by the School specified staff only and

will be compliant with current Safeguarding Regulations. Permitted excerpts can be viewed by governors during an exclusion panel, or Governor hearings, for example, with the appropriate measures for consent and safeguarding having been put in place.

- 3.6 Cameras are sited, and image capture restricted so as not to view areas that are not of interest and are not intended to be the subject of surveillance, such as private homes, gardens, other areas of private property. This also excludes the sports fields and car parks.
- 3.7 Unless an immediate response to events is required, cameras will not be directed at an individual, their property, or a specific group of individuals.
- 3.8 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will not be released other than to the police for use in the investigation of a specific crime.
- 3.9 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.
- 3.10 Warning signs will be placed at the main school entrances and at appropriate internal areas, as required by the ICO Code of practice. Signage is the responsibility of GTFM.

4. Operation of the System

- 4.1 The system will be administered and managed by GTFM, as Data Controller in accordance with the principles and objectives expressed in the ICO Code of Practice.
- 4.2 The CCTV system will be operational, but not manned.
- 4.3 GTFM will authorise members of the School staff nominated by the School to view the CCTV system, where appropriate.
- 4.4 The system will automatically overwrite recordings on a loop system every 31 days.

5. Management of the System

- 5.1 GTFM will check and confirm the efficiency of the system and in particular that the equipment is properly recording and that cameras are functional.
- 5.2 GTFM and the School will be responsible for maintaining system maintenance and viewing logs.

6. Liaison

- 6.1 Liaison meetings may be held with all bodies involved in the support of the system.

7. Monitoring procedures

- 7.1 CCTV surveillance monitors will be accessible during core hours and out of hours will be as required and via GTFM.
- 7.2 Monitors are installed in the CCTV room to which images will be continuously recorded, but not viewed.
- 7.3 When the system is not operational, the CCTV room will be locked, and the system screens will be turned off to prevent unauthorised viewing.

8. Viewing Procedures

- 8.1 Recording may be viewed by the Police for the prevention and detection of crime.
- 8.2 A record will be maintained of the release of recording to the Police A register will be available for this purpose.
- 8.3 Requests by the Police can only be actioned under section 29 of the Data Protection Act 2018.
- 8.4 Should the recording be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1, 8.2 and 8.3 of this Code. Recordings will only be released to the Police on the clear understanding that the recording remains the property of the project, and both the recording and information contained on it are to be treated in accordance with this code. The school also retains the right to refuse permission for the Police to pass to any other person the recording or any part of the information contained thereon. On occasions when a Court requires the release of an original recording this will be produced from the secure evidence device store, complete in its sealed bag.
- 8.5 The Police may require on request that the school retain a stored recording for possible use as evidence in the future. Such recordings will be properly indexed and securely stored until they are needed by the Police.
- 8.6 CCTV will only ever be used by the Data Controller and approved persons for the investigation or detection of crime or serious and/or gross misconduct. The use of CCTV will be justified in circumstances where the investigator has a reasonable suspicion that the crime or serious and/or gross misconduct is taking place and where CCTV use is likely to be a proportionate means of securing evidence.
- 8.7 CCTV evidence may be used against an employee by the School in disciplinary proceedings only where such evidence tends to show, in the reasonable belief of the employer, that they have been guilty of serious and/or gross misconduct. The employee will be given a chance to see and respond to the images in these circumstances by the School.
- 8.8 Images from CCTV used by either GTFM, BEP, CBC or the School to investigate crime or serious and/or gross misconduct will only be retained long enough for an incident to come to light and any investigation to be conducted.
- 8.9 Applications received from outside bodies (e.g. solicitors) to view or release recordings will be referred to GTFM and in matters concerning students the Head teacher of the School. In these circumstances the recording will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee may be charged in such circumstances by the School.

9. Breaches of the code (including breaches of security)

- 9.1 Any breach of the Code of Practice by any party will be initially investigated by the appropriate party.

10. Complaints

- 10.1 Any complaint about the school's CCTV system should be addressed to GTFM, as Data Controller. Any issues concerning the school will be forwarded to the Head teacher for reference.

Galliford Try Facilities Management.

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10.2 Complaints will be investigated in accordance with this Code.

11. Access by the Data Subject

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

11.2 Requests for Data Subject Access should be made to the Data Controller in accordance with the ICO Code of Practice.

12. Implementation and Review

This policy will be made known to all staff, parent/carers, students and governors via the academy website. This policy will be reviewed by the Governors every two years.

13. Author and Date

Nick Martin – September 2021

Updated NJM/BW - September 2023

Date ratified by Governors – September 2023

Next review date – September 2025