



CCTV Policy

At Queen Elizabeth's Grammar, Alford the named persons with responsibility for this Policy are:

Author	Headteacher
Data Protection Officer	Assistant Headteacher (C&S)
The System Manager	ICT Systems Manager
Governor	Full Governing Body



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1. AIMS

This policy aims to set out the school's approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on school property.

1.1 STATEMENT OF INTENT

The purpose of the CCTV system is to:

- Ensure members of the school community feel safe.
- Protect members of the school community from harm to themselves or to their property.
- Deter criminality in the school.
- Protect school assets and buildings.
- Determine the cause of accidents.
- Assist in the effective resolution of any disputes, which may arise in the course of disciplinary and grievance proceedings.
- To assist in the defence of any litigation proceedings.

The CCTV system will **not** be used to:

- Encroach on an individual's right to privacy.
- Monitor people in spaces where they have a heightened expectation of privacy (including toilets and changing rooms).
- Follow particular individuals, unless there is an ongoing emergency incident occurring.
- Pursue any other purposes than the ones stated above.

The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

The CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The system complies with the requirements of the Data Protection Act 2018 and UK GDPR.

Footage or any information gleaned through the CCTV system will never be used for commercial purposes.

In the unlikely event that the police request that CCTV footage be released to the media, the request will only be complied with when written authority has been provided by the police, and only to assist in the investigation of a specific crime.

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2. DEFINITIONS

- Surveillance: the act of watching a person or a place.
- CCTV: closed circuit television; video cameras used for surveillance.

3. LOCATION OF THE CAMERAS

Cameras are located in places that require monitoring in order to achieve the aims of the system.

Wherever cameras are installed appropriate signage is in place to warn members of the school community that they are under surveillance.

Cameras are not and will not be aimed off school grounds into public spaces or people's private property.

Cameras are positioned in order to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

4. ROLES AND RESPONSIBILITIES

4.1 THE GOVERNING BOARD

The governing board has the ultimate responsibility for ensuring the CCTV system is operated within the parameters of this policy and that the relevant legislation is complied with.

4.2 THE HEADTEACHER

The headteacher will:

- Take responsibility for all day-to-day leadership and management of the CCTV system.
- Liaise with the data protection officer (DPO) to ensure that the use of the CCTV system is in accordance with the stated aims and that its use is needed and justified.
- Ensure that the guidance set out in this policy is followed by all staff.
- Review the CCTV policy to check that the school is compliant with legislation.
- Sign off on any expansion or upgrading to the CCTV system, after having taken advice from the DPO and taken into account the result of a data protection impact assessment.
- Decide, in consultation with the DPO, whether to comply with disclosure of footage requests from third parties.

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4.3 THE DATA PROTECTION OFFICER

The data protection officer (DPO) will:

- Act as a point of contact for communications from the Information Commissioner's Office.
- Ensure data is handled in accordance with data protection legislation.
- Receive and consider requests for third-party access to CCTV footage.

4.4 THE SYSTEM MANAGERS

The system manager (site caretaker) will:

- Deal with subject access requests in line with the Freedom of Information Act (2000).
- Monitor compliance with UK data protection law.
- Advise on and assist the school with carrying out data protection impact assessments.
- Train persons with authorisation to access the CCTV system and footage in the use of the system and in data protection.
- Take care of the day-to-day maintenance and operation of the CCTV system
- Oversee the security of the CCTV system and footage
- Ensure footage is obtained in a legal, fair and transparent manner.
- Ensure footage is destroyed when it falls out of the retention period.
- Ensure that the CCTV systems are working properly and that the footage they produce is of high quality so that individuals pictured in the footage can be identified.
- Ensure that the CCTV system is not infringing on any individual's reasonable right to privacy in public spaces.
- Carry out checks to determine whether footage is being stored accurately, and being deleted after the retention period.

5. OPERATION OF THE CCTV SYSTEM

The CCTV system will be operational 24 hours a day, 365 days a year.

The system will not record audio.

Recordings will have date and time stamps. This will be checked by the system manager termly and when the clocks change.

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6. STORAGE OF CCTV FOOTAGE

Footage will be retained for 24 days. At the end of the retention period, the files will be overwritten automatically.

On occasion footage may be retained for longer than 24 days, for example where a law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation.

Recordings will be downloaded and encrypted, so that the data will be secure and its integrity maintained, so that it can be used as evidence if required.

7. ACCESS TO CCTV FOOTAGE

Access will only be given to authorised persons, for the purpose of pursuing the aims stated in this policy, or if there is a lawful reason to access the footage.

7.1 STAFF ACCESS

The following members of staff have authorisation to access the CCTV footage:

- The Headteacher.
- The Assistant Headteachers.
- The Data Protection Officer.
- The System Managers.
- Anyone with express permission of the Headteacher.

CCTV footage will only be accessed from authorised personnel's work devices, or from the visual display monitors.

All members of staff who have access will undergo training to ensure proper handling of the system and footage.

Any member of staff who misuses the surveillance system may be committing a criminal offence and will face disciplinary action.

7.2 SUBJECT ACCESS REQUESTS (SAR)

According to UK GDPR and Data Protection Act 2018, individuals have the right to request a copy of any CCTV footage of themselves.

Upon receiving the request the school will immediately issue a receipt and will then respond within 30 days during term time. The school reserves the right to extend that deadline during holidays due to difficulties accessing appropriate staff members.

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On occasion the school will reserve the right to refuse a SAR, if, for example, the release of the footage to the subject would prejudice an ongoing investigation.

Images that may identify other individuals need to be obscured to prevent unwarranted identification. The school will attempt to conceal their identities by blurring out their faces, or redacting parts of the footage. If this is not possible the school will seek their consent before releasing the footage. If consent is not forthcoming the still images may be released instead.

The school reserves the right to charge a reasonable fee to cover the administrative costs of complying with an SAR that is repetitive, unfounded or excessive.

7.3 THIRD-PARTY ACCESS

CCTV footage will only be shared with a third party to further the aims of the CCTV system.

Footage will only ever be shared with authorised personnel such as law enforcement agencies or other service providers who reasonably need access to the footage.

All requests for access should be set out in writing and sent to the Headteacher and the DPO.

The school will comply with any court orders that grant access to the CCTV footage. The school will provide the courts with the footage they need without giving them unrestricted access. The DPO will consider very carefully how much footage to disclose and seek legal advice if necessary.

The DPO will ensure that any disclosures that are made are done in compliance with UK GDPR.

All disclosures will be recorded by the DPO.

8. SECURITY

- The headteacher will be responsible for overseeing the security of the CCTV system and footage.
- Any faults in the system will be reported as soon as they are detected and repaired as soon as possible, according to the proper procedure.
- Footage will be stored securely.
- Proper cyber security measures will be put in place to protect the footage from cyber attacks.
- Any software updates (particularly security updates) published by the equipment's manufacturer that need to be applied, will be applied as soon as possible.

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9. COMPLAINTS

Complaints should be directed to the Headteacher and should be made according to the school's [Complaints Policy](#).

10. MONITORING

The policy will be reviewed annually by the DPO to consider whether the continued use of a surveillance camera remains proportionate and effective in meeting its stated purposes.

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