



Aletheia
Academies Trust

CCTV Policy

December 2024

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This procedure was adopted by the Board of Trustees of Aletheia Academies Trust, for implementation in all Trust academies on the date above and supersedes any previous CCTV Policy.



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1. Introduction

- 1.1** The purpose of this policy is to regulate management, operation, and use of closed-circuit television (CCTV) within the Aletheia Academies Trust ('The Trust').
- 1.2** This policy adheres to guidelines from the Information Commissioners Office (ICO) CCTV Code of Practice.
- 1.3** CCTV systems are maintained by third party contractors and / or he Trust IT Support Team, in conjunction with the Premises Team (at individual academies). Maintenance is dependent on the systems installed.

2. Aims

- 2.1** Increase the personal safeguarding of staff, students, and visitors.
- 2.2** Reduce property loss and strengthen theft detection and prevention.
- 2.3** Support the Police and other law-enforcement agencies.
- 2.4** Protect buildings, property, and other assets.
- 2.5** Support disciplinary or grievance procedures (subject to confidentiality requirements).



3. Data Protection

3.1 The use of CCTV and the associated images is covered by the Data Protection Act 2018.

3.2 The Trust will comply with the Information Commissioner's Office (ICO) CCTV guidance to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use. The guidance is published here: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/guidance-on-video-surveillance-including-cctv/>

3.3 In line with the Data Protection Act 2018, the Trust will provide sufficient notification to persons, through Trust approved signage around each academy site, when entering academy premises, that areas are monitored and recorded by CCTV. Individual academies can contact the Operations Officer for guidance on where to procure appropriate and additional signage.



4. Camera Location

- 4.1** Cameras are sited so they only capture images (audio will not recorded) relevant to the purposes for which they are installed, and care will be taken to ensure that reasonable privacy expectations are not violated.
- 4.2** Each site will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act 2018.
- 4.3** Where possible, cameras are positioned so that their coverage is restricted to the site premises, which may include outdoor areas.
- 4.4** Members of staff can contact the IT Support Team or the Premises Team (at individual academies) for details of where CCTV cameras are situated.
- 4.5** Signs are placed so that students, staff, and the public are aware that they are entering a zone which is covered by surveillance equipment or live monitoring.
- 4.6** The purpose of the use of CCTV is displayed: "Images are being monitored and recorded for the purposes of crime prevention and public safety".

5. Storage and Retention

- 5.1** Recorded footage will not be retained for longer than is necessary.
- 5.2** Recordings are retained for 30 days as standard, unless a recording is required for further investigation, usually by the Police. Due to storage limitations at some academies, the standard 30 day period may be reduced to a minimum period of 15 days for the retention of footage; all dependent on storage capacity and hardware limitations at individual academies
- 5.3** All retained footage is stored securely and access to recorded images is restricted to those staff authorised to view them.








6. Staff Access Rights

- 6.1** IT Support, the Premises Team (at individual academies), and senior management have full access to CCTV systems.
- 6.2** Office and reception staff can observe live footage of designated cameras that allow views of otherwise obscured areas of interest in relation to their front-of-school role(s). This includes, but is not limited to: entrance gates, parking areas, pedestrian gates, reception desks, and visitor waiting areas.
- 6.3** Pastoral staff can request to view CCTV recorded footage in line with Aims (2), excluding Aim 2.5.
- 6.4** No other cameras other than the designated cameras will be accessible for live monitoring and no recorded footage will be accessible to unauthorised personnel.

7. Maintenance

- 7.1** Academies must report immediately any CCTV related concerns and issues to IT Support.
- 7.2** Where logistically possible, IT Support and the Premises Team (at individual academies) are responsible for ensuring regular checks are carried out, including:

-  Checking any saved footage is not stored beyond retention periods
-  Checking sample footage can be retrieved and is playable.
-  Checking the cameras and equipment are operating properly.
-  Determining if equipment is no longer technologically fit-for-purpose and should be upgraded.
-  Ensuring any special features are accurate (e.g., error reporting and time display).



8. Subject Access Requests (SARs)

- 8.1** Individuals have the right to request access to CCTV footage relating to themselves.
- 8.2** All requests should be made in writing to the Headteacher of the academy concerned. For a request to be considered, individuals will be asked to provide sufficient information to enable footage to be sourced and identified within a reasonable amount of time, including date, time range, physical location, and the anticipated content.
- 8.3** Identification will need to be confirmed before any footage is retrieved to ensure no personal data is shared with the wrong individual. Within this time, a copy of the footage may be downloaded for permanent retention.
- 8.4** Where possible, footage will be presented in sequential order; however, non-relevant segments may be edited to reflect time lapses.
- 8.5** Where possible, the date and time will be displayed on-screen as part of the provided footage and on-screen display. However, this cannot be guaranteed due to potential hardware and software limitations.
- 8.6** Parents or carers may be invited to the academy to view CCTV footage involving their child, accompanied by a member of staff, if agreed upon by both parties. Where possible, access to footage will be facilitated on school premises to maintain data security and protect the privacy of others. If a formal request is made for a copy of the footage, this will be considered on a case-by-case basis and be subject to safeguarding and data protection requirements.
- 8.7** The Trust will respond to such requests as documented in line with the Trust GDPR and Data Protection policy. Due to storage limitations at some academies (5.2), it is not guaranteed that footage beyond 15 days from the date of recording will be available.



- 8.8** Due to the variety and age of CCTV equipment, hardware malfunctions may lead to gaps in any requested video footage and in some cases, no available footage if the video feed was interrupted or not present.
- 8.9** The Trust will review requests on an individual basis and reserves the right to refuse request for excessive amounts of CCTV footage, or if a request would prejudice the legal rights of other individuals and / or jeopardise an investigation.
- 8.10** There will be no disclosure of recorded footage to separate third parties, other than to authorised personnel such as the Police.
- 8.11** The Trust will follow a data minimisation approach, ensuring only footage directly relevant to the request is provided. Whenever possible, footage will be presented in sequential order; however, non-relevant segments may be edited to reflect time lapses. Images of third parties will be blurred out where required.

9. Complaints

- 9.1** Complaints and enquiries about the operation of CCTV within the Trust should first be directed to the Headteacher / Head of School of the relevant academy.