



Aletheia
Academies Trust

CCTV Policy

December 2022

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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.
- 1.2** This policy adheres to guidelines from the Information Commissioners Office (ICO) CCTV Code of Practice.
- 1.3** CCTV systems are maintained by IT Services and the Premises Team (at individual schools).

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 the 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/guide-to-data-protection/key-dp-themes/guidance-on-video-surveillance-including-cctv/about-this-guidance/>
- 3.3** In line with the Data Protection Act 2018, the Trust will provide sufficient notification to persons, through Trust approved signage around each school site, when entering school premises, that areas are monitored and recorded by CCTV. Individual schools can contact the Operations Officer for additional signage.



4. Camera Location

- 4.1** Cameras are sited so they only capture images (audio will not be 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 IT Services or the Premises Team (at individual schools) 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. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.
- 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 schools, the standard 30 days period may be reduced to a minimum period of 15 days for retention of footage.
- 5.3** All retained footage is stored securely and access to recorded images is restricted to those staff authorised to view them. Access will not be provided to unauthorised staff.



6. Staff Access Rights

- 6.1** IT Services, the Premises Team (at individual schools), 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** Schools must report immediately any CCTV related concerns and issues to IT Services.
- 7.2** Where logistically possible, IT Services and the Premises Team (at individual schools) 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 school concerned. Individuals submitting requests for access will be asked to provide sufficient information (e.g., date, time, and location) to enable footage relating to them to be sourced and identified.
- 8.3** Identification will need to be confirmed before any footage is transmitted or retrieved to ensure no personal data is transmitted to a third party.
- 8.4** Any disclosed footage must either transmitted via secure digital transfer or through protected physical media such as an encrypted USB drive.
- 8.5** The Trust will respond to such requests as documented in the Trust GDPR and Data Protection policy. Due to storage limitations at some schools (5.2), it is not guaranteed that footage beyond 15 days from date of recording will be available for access.
- 8.6** The Trust will review requests on an individual basis and reserves the right to refuse access for excessive amounts of CCTV footage, or if a request would prejudice the legal rights of other individuals/jeopardise an investigation.
- 8.7** There will be no disclosure of recorded footage to third parties, other than to authorised personnel such as the Police.

9. Complaints

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