



## CCTV Policy

### Policy for Alternative Provision Providers used by County Durham Schools

Reviewed:	Reviewed By:	
	Name:	Signature:
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January 2026	John Southeran / Kim Turnbull	
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## **Statement of intent**

At Education Plus, we take our responsibility towards the safety of staff, visitors and pupils very seriously. To that end, CCTV is used internally and externally around the provision buildings for the purpose of usually the prevention and detection of crime and for the investigation of incidents, and for the security and protection of staff and students. Both systems are monitored daily to ensure that they are working correctly, all notifications from the systems are directed to Harvey Wake.

The purpose of this policy is to manage and regulate the use of the CCTV systems at Education Plus and ensure that:

- We comply with data protection legislation, including the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) – the latter of which came into effect 25 May 2018
- The images that are captured are useable for the purposes we require them for.
- We reassure those persons whose images are being captured, that the images are being handled in accordance with data protection legislation.

The CCTV system is based around digital technology and therefore needs to be treated as information that will be processed under the general principles of the Data Protection Act 2018. A Data Protection Policy is available from the main office. We will be following the CCTV Code of Conduct generated by the Data Protection Commissioner in July 2000 and amended in November 2021.

Education Plus is committed to ensuring that the data will be:

- Fairly and lawfully processed
- Processed for limited purposes and not in any manner incompatible with those purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept for longer than is necessary
- Secure
- Not transferred without adequate protection

The Data Protection Officer (DPO) for Education Plus is John Southeran, their role includes:

- ensuring that all data controllers handle and process CCTV footage in accordance with data protection legislation.
- Ensuring that CCTV footage is obtained in line with legal requirements.
- Ensuring CCTV footage is destroyed in line with legal requirements when it falls outside of its retention period.
- Keeping comprehensive and accurate records of all data processing activities, including surveillance and CCTV footage, detailing the purpose of the activity and making these records public upon request.
- Informing data subjects of how their data captured in CCTV footage will be used, their rights for the data to be destroyed and the measures implemented to protect individuals' personal information.
- Abiding by confidentiality requirements in relation to the duties undertaken while in the role.

Those with designated management of the CCTV System are:

Offsite Manager(s) – Harvey Wake

Inhouse Manager(s) – Kim Turnbull (Shildon Site)

## **Purpose and justification**

The purpose of the CCTV system is to ensure that key areas of the sites are kept secure from intrusion, damage or disruption and those within the site from intentional or accidental hurt, or for such incidents to be monitored, either in real-time or for subsequent investigation. Under no circumstances will CCTV cameras be present in changing facilities.

The quality of images produced by the equipment will be such that positive matches against any existing member of staff, student, authorised visitor or unauthorised intruder may be made by nominated personnel or legal authorities. This may only be done in accordance with the purpose of the scheme, e.g., legal authorities identifying intruders, staff identifying perpetrators of vandalism.

Records of assessments made will be logged, including who requested the match, who made the assessment, which subjects were involved and whether the match was positive or not. All cameras and equipment will require regular maintenance, and this should be logged appropriately by the Centre Manager.

## **Objectives:**

The CCTV system will be used to:

- Maintain a safe environment.
- Ensure the welfare of pupils, staff and visitors.
- Deter criminal acts against persons and property.
- Assist the police in identifying persons who have committed an offence.

## **Data Retention and Storage**

Data retention period for the internal and external cameras is 30 days, unless a request has been made for images to be processed or assessed by relevant members of staff or by a legal authority. Such data will be retained only for the period required for any investigation or legal proceedings to take place and be concluded. Images required for evidential purposes will be retained in a secure cloud storage until conclusion of any investigation or legal proceedings.

Once the retention period has expired the images will be removed or erased. Should media, on which images have been recorded, be removed for use in legal proceedings the nominated operator will ensure that the following is documented:

- the date on which the images were removed from the system for use in legal proceedings.
- the reason why they were removed.
- any crime incident number to which images may be relevant.
- the location of the images, for example, if the images were handed to a police officer for retention, the name and station of that police officer.
- the signature of the collecting police officer, where appropriate.
- the reason for the viewing.
- the names, where appropriate, of those who viewed the images.
- the outcome of any viewing.
- the date and time the images were returned to the system or secure location (if they still require retention).

## **Security**

All staff that encounter images, individuals requesting access to images or third parties requesting information about images will be made aware of this policy, the contents and procedures involved. Access to the CCTV System, software and data will be strictly limited to authorised operators and will be password protected.

- Nominated operators are:
  - Offsite Manager(s) – Harvey Wake

- Inhouse Manager(s) – Kim Turnbull (Shildon Site)
- The main control facility is kept secure and locked when not in use.
- CCTV systems will not be intrusive.
- The DPO and Centre Manager will decide when to record footage.
- Any cameras that present faults will be repaired immediately as to avoid any risk of data breach.

### **Code of Practice**

Education Plus understands that;

- recording images of identifiable individuals constates as processing personal information, so it is done in line with data protection principles.
- all students, staff and visitors must be notified of the purpose for collecting CCTV data via signs in the centre where cameras are based
- CCTV cameras are only placed where they do not intrude on anyone's privacy and are necessary to fulfil their purpose.
- the purpose of CCTV system is for the prevention and detection of crime and the promotion of the health, safety and welfare of staff, pupils and visitors.
- The CCTV system is owned by them and images from the system are strictly controlled and monitored by authorised personnel only.
- the CCTV system is used to create a safer environment for staff, pupils and visitors to the provision and to ensure that its operation is consistent with the obligations outlined in data protections legislation.

### **Access**

Under the GDPR, individuals have the right to obtain confirmation that their personal information is being processed. All disks containing images belong to and remain the property of Education Plus.

Individuals have the right to a subject access request (SAR) to gain access to their personal data to verify the lawfulness of the processing Education Plus will verify the identity of the person making the request before any information is supplied.

Releasing the recorded images to third parties will be permitted only in the following limited and prescribed circumstances, and to the extent required or permitted by law:

- The police – where the images recorded would assist in a specific criminal inquiry.
- Persons who have been recorded and whose images have been retained where disclosure is required by virtue of data protection legislation.
- Prosecution agencies.
- Relevant legal representatives.

Requests for access or disclosure will be recorded and the centre manager will make the final decision as to whether recorded images may be released to persons other than the police.

### **Monitoring and review**

This policy will be monitored and reviewed on an annual basis, or in light of any changes to relevant legislation by the DPO and the Centre Manager.

Any changes to the policy will be communicated to all members of staff.