

Surveillance and CCTV Policy

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Surveillance and CCTV policy: document provenance

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Summary of changes in this review	<ul style="list-style-type: none"> • Additional information relating to data subjects’ rights for subject access requests is included in item 12 • Additional information relating to how CCTV footage links with safeguarding has been added in item 12
Related policies and documents	<ul style="list-style-type: none"> • The Freedom of Information Policy • Data Protection Policy • The Surveillance Camera Code of Practice March 2022 • Home Office (2013) ‘The Surveillance Camera Code of Practice’ • ICO (2017) ‘Overview of the General Data Protection Regulation (GDPR)’ • ICO (2017) ‘In the picture: A data protection code of practice for surveillance cameras and personal information’ • Keeping Children Safe in Education (current version)

Unless there are legislative or regulatory changes in the interim, the policy will be reviewed as by the review cycle. Should no substantive change be required at this point, the policy will move to the next review cycle.

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1.0 Policy statement

At Dixons Academies Trust, we take our responsibility towards the safety of students, staff and visitors very seriously, and in particular our duty to safeguard and promote the welfare of our students, including through effective behaviour management and maintaining a safe environment. To that end, we use surveillance cameras to monitor any instances of inappropriate behaviour, or physical damage to our academies, whether it is by a student, staff member or another person.

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

- the images that are captured are useable for the purposes we require them for
- the images that are captured are used appropriately and in the best interests of our students first and foremost
- we reassure those persons whose images are being captured that the images are being handled in accordance with GDPR and data protection legislation

This policy covers the use of surveillance and CCTV systems which capture moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes:

- observing what an individual is doing
- taking action to prevent a crime
- using images of individuals that could affect their privacy
- investigating any accidents (or 'near misses'), incidents, allegations

2.0 Legal framework

2.1 This policy has due regard to legislation including, but not limited to, the following:

- The Regulation of Investigatory Powers Act 2000
- The Protection of Freedoms Act 2012
- The General Data Protection Regulation
- The Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998
- The Children Act 1989
- The Children Act 2004
- The Equality Act 2010

2.2 This policy has been created with regard to the following statutory and non-statutory guidance:

- Home Office (2013) 'The Surveillance Camera Code of Practice'
- ICO (2017) 'Overview of the General Data Protection Regulation (GDPR)'
- ICO (2017) 'In the picture: A data protection code of practice for surveillance cameras and personal information'
- Keeping Children Safe in Education 2024
- Freedom of Information Policy
- GDPR Data Protection Policy
- The Surveillance Camera Code of Practice March 2022, issued by The Biometrics and Surveillance Camera Commissioner

3.1 Definitions

3.1 For the purpose of this policy a set of definitions will be outlined, in accordance with the surveillance code of conduct:

- surveillance – monitoring the movements and behaviour of individuals; this can include video, audio or live footage. For the purpose of this policy only video and audio footage will be applicable



- overt surveillance – any use of surveillance for which authority does not fall under the Regulation of Investigatory Powers Act 2000
- covert surveillance – any use of surveillance which is intentionally not shared with the subjects it is recording. Subjects will not be informed of such surveillance

3.2 Dixons Academies Trust does not condone the use of covert surveillance when monitoring the academy’s staff, students and / or volunteers. Covert surveillance will only be operable in extreme circumstances.

3.3 Any overt surveillance footage will be clearly signposted around the academy.

4.0 Objectives

4.1 The surveillance system will be used to:

- maintain a safe environment
- promote the welfare of students, staff, and visitors
- deter criminal acts against persons and property
- assist the police in identifying persons who have or may have committed an offence
- inform other investigations or meet our trusts regulatory or other legal obligations as necessary.

5.1 Roles and responsibilities

5.1 The role of the data protection officer (DPO) includes:

- dealing with freedom of information requests and subject access requests (SAR) in line with legislation, including the Freedom of Information Act 2000
- ensuring that all data controllers at the academy handle and process surveillance and CCTV footage in accordance with data protection legislation
- ensuring that surveillance and CCTV footage is obtained in line with legal requirements
- ensuring consent is clear, positive and unambiguous. Pre-ticked boxes and answers inferred from silence are non-compliant with the GDPR
- ensuring that surveillance and 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 surveillance and CCTV footage will be used by the academy, their rights for the data to be destroyed and the measures implemented by the academy to protect individuals’ personal information
- preparing reports and management information on the academy’s level of risk related to data protection and processing performance
- reporting to the highest management level of the trust, eg the board of trustees
- abiding by confidentiality requirements in relation to the duties undertaken while in the role
- monitoring the performance of the academy’s data protection impact assessment (DPIA) and providing advice where requested
- presenting reports regarding data processing at the academy to senior leaders and the trust

5.2 Dixons Academies Trust, as the corporate body, is the data controller. The board of trustees of Dixons Academies Trust therefore has overall responsibility for ensuring that records are maintained, including security and access arrangements in accordance with regulations.

5.3 The administration manager deals with the day-to-day matters relating to data protection and thus, for the benefit of this policy will act as the data controller.

5.4 The role of the data controller includes:

- processing surveillance and CCTV footage legally and fairly
- collecting surveillance and CCTV footage for legitimate reasons and ensuring that it is used accordingly



- collecting surveillance and CCTV footage that is relevant, adequate and not excessive in relation to the reason for its collection
- ensuring that any surveillance and CCTV footage identifying an individual is not kept for longer than is necessary
- protecting footage containing personal data against accidental, unlawful destruction, alteration and disclosure – especially when processing over networks

5.5 The role of the principal includes:

- meeting with the DPO to decide where CCTV is needed to justify its means
- conferring with the DPO with regard to the lawful processing of the surveillance and CCTV footage
- reviewing the Surveillance and CCTV Policy to ensure it is compliant with current legislation
- monitoring legislation to ensure the academy is using surveillance fairly and lawfully
- communicating any changes to legislation with all members of staff

5.6 The role of the Designated Safeguarding Lead includes:

- working closely with the wider senior leadership and pastoral teams to identify when CCTV should be accessed
- ensuring that CCTV access is being used appropriately as part of the academy's duty to safeguard and promote the welfare of students
- being able to access CCTV efficiently in safeguarding and welfare situations where time is an exacerbating factor
- being able to delegate review of CCTV footage to a deputy designated safeguarding lead or, when appropriate, another colleague
- taking a lead on ensuring any safeguarding or welfare concern raised is followed up and recorded in line with the Safeguarding Child Protection Policy and the most recent version of Keeping Children Safe in Education
- communicate any issues with their academy's surveillance and CCTV system to the principal

6.0 Purpose and justification

6.1 The academy will only use surveillance cameras for the safety and security of the academy and its staff, students, and visitors.

6.2 Surveillance will be used as a deterrent for inappropriate behaviour and damage to the academy.

6.3 The academy will only conduct surveillance as a deterrent and under no circumstances will the surveillance and the CCTV cameras be present in academy classrooms, toilet cubicles or any changing facility.

7.0 The data protection principles

7.1 Data collected from surveillance and CCTV will be:

- processed lawfully, fairly and in a transparent manner in relation to individuals
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- accurate and, where necessary, kept up to date; every reasonable step will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

8.0 Protocols

8.1 The surveillance system will be registered with the ICO in line with data protection legislation.

8.2 The surveillance system is a closed digital system.

8.3 Signage is placed at our premises where there is CCTV surveillance.



- 8.4 The surveillance system has been designed for maximum effectiveness and efficiency; however, the academy cannot guarantee that every incident will be detected or covered and 'blind spots' may exist.
- 8.5 The surveillance system will not be trained on individuals unless an immediate response to an incident is required.
- 8.6 The surveillance system will not be trained on private vehicles or property outside the perimeter of the academy.

9.0 Security

- 9.1 Access to the surveillance system, software and data will be strictly limited to authorised operators and will be password protected.
- 9.2 The authorised CCTV system operators are: principals, DSLs, DDSLs and the DPO (Trust). In some cases (depending on the type of CCTV installed), a member of estates can be appointed by the principal to be an authorised operator.
- 9.3 The main control facility is kept secure and locked when not in use.
- 9.4 If, in exceptional circumstances, covert surveillance is planned, or has taken place, copies of the Home Office's authorisation forms will be completed and retained.
- 9.5 Surveillance and CCTV systems will be tested for security flaws once a month to ensure that they are being properly maintained at all times.
- 9.6 Surveillance and CCTV systems will not be intrusive.
- 9.7 The DPO and principal will decide when to record footage, e.g. a continuous loop outside the academy grounds to deter intruders.
- 9.8 Any unnecessary footage captured will be securely deleted from the academy system.
- 9.9 Each system will have a separate audio and visual system that can be run independently of one another. Audio CCTV will only be used in the case of deterring aggressive or inappropriate behaviour.
- 9.10 Any cameras that present faults will be repaired immediately as to avoid any risk of a data breach.
- 9.11 Visual display of CCTV is accessible through a secure connection online.

10.0 Privacy by design

- 10.1 The use of surveillance cameras and CCTV will be critically analysed using a DPIA, in consultation with the DPO.
- 10.2 A DPIA will be carried out prior to the installation of any surveillance and CCTV system.
- 10.3 If the DPIA reveals any potential security risks or other data protection issues, the academy will ensure they have provisions in place to overcome these issues.
- 10.4 Where the academy identifies a high risk to an individual's interests, and it cannot be overcome, the academy will consult the ICO before they use CCTV, and the academy will act on the ICO's advice.
- 10.5 The academy will ensure that the installation of the surveillance and CCTV systems will always justify its means.
- 10.6 If the use of a surveillance and CCTV system is too privacy intrusive, the academy will seek alternative provision.

