HAMSTEAD HALL ACADEMY TRUST

HHAT C.C.T.V. POLICY

Policy Owner:	Martin Godfrey
Version Number:	Two
Approver: (Trust Board / Audit, Finance & Risk Committee / CEO):	Trust Board
Date Approved:	28/06/2025
Classification (Public / Internal):	Public
Statutory Policy (Yes / No):	Yes
Review Date:	28/06/2028

Statement of intent

Hamstead Trust take our responsibility towards the safety of staff, visitors and pupils very seriously. To that end, we use surveillance cameras to monitor any instances of aggression or physical damage to our school and its members.

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

- We comply protection legislation under the General Data Protection Regulation (GDPR) – the legislation which came into effect in 25 May 2018.

- The images that are captured are useable for the purposes we require them for; we reassure those people whose images are being captured, that the images are being handled in accordance with 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

Purpose

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 behavior of individuals; this can include video, or live footage. For the purpose of this policy only video footage will be applicable.

- **Overt surveillance** – any use of surveillance for which authority does not fall under the Regulation of Investigatory Powers Act 2000. Any overt surveillance footage will be clearly signposted around the school and D.P.O. will sign off the authority.

- **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 should the requirement be needed. Covert surveillance will only be operable in extreme circumstances signed off by the D.P.O.

The data protection principles

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; further processing for archiving purposes in public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial 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; personal data may be stored for longer periods, insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organizational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.

- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

Objectives

- Maintain a safe environment for all at the trust.

- Ensure the welfare of pupils, staff and visitors.

- Deter criminal acts against people and trust property.

- Assist the police in identifying people who have committed an offence.

- The school will only conduct surveillance as a deterrent and under no circumstances will the surveillance and the CCTV cameras be present in school classrooms or any changing facility.

- If the surveillance and CCTV systems fulfil their purpose and are no longer required, the school will deactivate them.

- The surveillance system is a closed digital system which does not record audio.

- Warning signs have been placed throughout the premises where the surveillance system is active, as mandated by the ICO's Code of Practice.

- The surveillance system will not be trained on individuals unless an immediate response to an incident is required.

- The surveillance system will not be trained on private vehicles or property outside the perimeter of the school.

Roles and responsibilities

The role of the head teacher as 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 school 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.

The surveillance and CCTV footage are overwritten technically destroyed in line with legal requirements when it falls outside of its retention period of 31 days.

Keeping 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 school, their rights for the data to be destroyed and the measures implemented by the school to protect individuals' personal information.

Preparing reports and management information on the school's level of risk related to data protection and processing performance.

Reporting to the highest management level of the school, e.g. the trust board members.

Abiding by confidentiality requirements in relation to the duties undertaken while in the role.

- GDPR the data protection impact assessment and providing advice where requested.

- Presenting reports regarding data processing at the school to senior leaders and the trust board members.

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

Access to the system

The systems can only be accessed by approved individuals listed below in a secure location with door access control. All people accessing the recording room have to sign in and sign out on every occasion. The door access system also logs who has been in the room and for how long.

- **Martin Godfrey**
- **Carla Tranter (D.P.O.)**
- **Jonathan Mortimer**
- **Duncan Walker**
- **Manjit Uppal**
- **Elizabeth Stevenson**
- **Tom Bill**
- **Steve Arthrobus**
- **I.T. Department**

Where a request for images is manifestly unfounded or excessive, the school holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it.

In the event that a large quantity of information is being processed about an individual, the school will ask the individual to specify the information the request is in relation to.

It is important that access to, and disclosure of, the images recorded by surveillance and CCTV footage is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact, should the images be required for evidential purposes.

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

- Prosecution agencies – such as the Crown Prosecution Service (CPS)
  Relevant legal representatives – such as lawyers and barristers.

Review

This policy will be monitored and reviewed on a biennial basis, or in light of any changes to relevant legislation.

The Head teacher will be responsible for monitoring any changes to legislation that may affect this policy and make the appropriate changes accordingly.