

Amadeus Primary Academies Trust

CCTV Statement

Date: June 2018 (Reviewed November 2025)	Review: November 2027
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Amadeus Primary Academies Trust (“APAT”), a multi academy trust. APAT is a charitable company limited by guarantee (registration number 09662313) whose registered office is Old Bexley Church Of England Primary School, Hurst Road, Bexley, DA5 3JR. APAT is the Data Controller for all the academies within the Trust.

The Data Protection Officer for APAT is Sabrina Bridges. The Data Protection Officer is supported by Peter Rhodes, Hillsgrove Primary School Headteacher and Associate Data Protection Officer. The Data Protection Officer can be contacted as follows:

Sabrina Bridges **Data Protection Officer**

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Policy purpose and summary

This Policy outlines the use of Closed-Circuit Television (CCTV) within the Amadeus Primary Academies Trust and how it is used and managed in accordance with data protection and privacy obligations.

Summary of changes at last review:

- Legislation and Regulatory framework added

Related documents:

- Data Breach Policy
- Information and Records Retention Policy
- Information Security Policy
- Privacy Notices
- Procedure for Police and other Organisation Requests for Information under Schedule 2 Part 1 Para. 2 Data Protection Act 2018 (*Previously a request under Section 29 of the Data Protection Act 1998*)

CCTV Policy

1. Policy Statement

- 1.1. This document sets out the appropriate actions and procedures, which must be followed to comply with data protection legislation in respect of the use of CCTV surveillance systems managed by Amadeus Primary Academies Trust.
- 1.2. We believe that CCTV and other surveillance systems have a legitimate role to play in helping to maintain a safe and secure environment for all our staff, pupils and visitors. However, we recognise that this may raise concerns about the effect on individuals and their privacy. This policy is intended to address such concerns.
- 1.3. Images recorded by surveillance systems are personal data which must be processed in accordance with data protection laws. We are committed to complying with our legal obligations and ensuring that the legal rights of staff, pupils and visitors, relating to their personal data, are recognised and respected.
- 1.4. This policy is intended to assist staff in complying with their own legal obligations when working with personal data. In certain circumstances, misuse of information generated by CCTV or other surveillance systems could constitute a criminal offence.

2. Scope

- 2.1. This policy applies to the following Academies within the Amadeus Primary Academies Trust:
 - Castilion Primary School
 - Old Bexley CE Primary School
 - St Paulinus CE Primary School

3. Legislation and Regulation

- 3.1. The following legislation and regulations apply in respect of this policy:
 - Data Protection Act 2018
 - ICO Code of Practice for Surveillance Cameras and Personal Information
 - The Protection of Freedoms Act 2012 – Part 2
 - Surveillance Camera Code of Practice in accordance with Section 29 of the Protection of Freedoms Act 2012

4. CCTV usage

- 4.1. We currently use CCTV cameras to view and record individuals on and around our premises. This policy outlines why we use CCTV, how we will use CCTV and how we will process data recorded by CCTV cameras to ensure we are compliant with data protection law and best practice.
- 4.2. We recognise that information that we hold about individuals is subject to data protection legislation. The images of individuals recorded by CCTV cameras in the workplace are personal data and therefore subject to the legislation. We are committed to complying with all our legal obligations and seek to comply with best practice suggestions from the Information Commissioner's Office (ICO).
- 4.3. This policy covers all employees, contractors, trustees, volunteers and any other individuals engaged to perform services for Amadeus Primary Academies Trust. This policy is available on the Trust website, and a hard copy can be obtained from the Academy office. This policy has been reviewed by

been delegated to the Chief Finance and Operations Officer (CFOO). Day-to-day operational responsibility for CCTV cameras and the storage of data recorded is the responsibility of the Principal.

- 5.2. This policy will be maintained and reviewed at least annually under the supervision of the Trust DPO to ensure that the use of CCTV continues to be justified and that the appropriate measures are in place to mitigate data protection risks raised by its use. The Trust Board will review the policy every two years or earlier if significant changes are made to the policy.

6. Purpose of the CCTV System

6.1. We currently use CCTV on our premises for the following reasons:

- to prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime;
- for the personal safety of pupils, staff, visitors and other members of the public and to act as a deterrent against crime;
- to support law enforcement bodies in the prevention, detection and prosecution of crime;
- to assist in the day-to-day management, including ensuring the health and safety of pupils, staff and others; and
- to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.

6.2. This list is not exhaustive, and other purposes may be or become relevant.

7. Monitoring

7.1. Cameras are situated to ensure they cover Trust premises as far as is possible, including the exterior of buildings, vulnerable public facing areas, car parks, outside spaces, communal areas within buildings and both the main entrance and secondary exits.

7.2. The CCTV system is currently in operation and capable of being monitored 24 hours a day, every day of the year.

7.3. As far as practically possible CCTV cameras will not focus on private homes, gardens or other areas of private property.

7.4. Prior to introducing any new surveillance system, including placing a new CCTV camera in any workplace location, we will carefully consider if they are appropriate by carrying out a Data Privacy Impact Assessment (DPIA).

7.5. Any DPIA will consider the nature of the problem that we are seeking to address at that time and whether the surveillance camera is likely to be an effective solution, or whether a better solution exists. In particular, we will consider the effect a surveillance camera will have on individuals and therefore whether its use is a proportionate response to the problem identified.

8. How will we operate any CCTV?

- 8.1. We will ensure that signs are displayed at the entrance of the surveillance zone to alert individuals that their image may be recorded.
- 8.2. We will ensure that live feeds from cameras and recorded images are only viewed by Authorised Employees whose role requires them to have access to such data. Recorded images will only be viewed in designated, secure offices.
- 8.3. We will never engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place) unless, in highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or equivalent serious malpractice is taking place and, after suitable consideration, we reasonably believe there is no less intrusive way to tackle the issue.
- 8.4. In the unlikely event that covert monitoring is considered to be justified, the Academy will carry out a Data Protection Impact Assessment (please see section 7.4 above for more information). The rights of individuals whose images may be captured will always be taken into account in reaching any such decision.
- 8.5. We will never engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place) unless, in highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or equivalent serious malpractice is taking place and, after suitable consideration, we reasonably believe there is no less intrusive way to tackle the issue.
- 8.6. Privacy notices for Pupils and Parents are available to our Parents and wider community.

“In addition, the School also uses CCTV cameras around the school site for security purposes and for the protection of staff and pupils. CCTV footage may be referred to during the course of disciplinary procedures (for staff or pupils) or to investigate other issues. CCTV footage involving parents / carers will only be processed to the extent that it is lawful to do so. Please see our CCTV policy for more details”

- 8.7. In the unlikely event that covert monitoring is considered to be justified, the Academy will carry out a Data Protection Impact Assessment (please see section 7.4 above for more information). The rights of individuals whose images may be captured will always be taken into account in reaching any such decision.

9. Use of data gathered by CCTV

- 9.1. In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the data, where it is possible to do so.
- 9.2. We may engage data processors to process data on our behalf. We will ensure reasonable contractual safeguards are in place to protect the security and integrity of the data where this is the case.
- 9.3. CCTV images may only be viewed by Authorised Employees. All Authorised Employees viewing the

normally be released unless satisfactory evidence that it is required in connection with legal proceedings or if a court order has been produced. The Principal at their discretion, can invite parents in to view CCTV images/footage.

- 12.5. In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime. Only written requests made under Schedule 2 Part 1 Para. 2 Data Protection Act 2018 (previously Section 29 Request) will be considered. Such requests must specify the date and time (as far as possible) of the images required. If CCTV footage is disclosed to a law enforcement agency the Trust will record what information has been disclosed, when the disclosure was made, to whom it was disclosed and for what purpose(s). If the decision is taken not to release the images, then the image in question will be held and not destroyed until all legal avenues have been exhausted.
- 12.6. We will maintain a record of all disclosures of CCTV footage.
- 12.7. No images from CCTV should ever be posted online or disclosed to the media by any member of staff.

13. Internal use of CCTV

- 13.1. If a member of staff considers that CCTV footage might be needed for an internal matter (e.g. a pupil disciplinary issue) they should speak to the Regional Safeguarding Lead in the first instance.

14. Data subject access requests (DSARs)

- 14.1. Data subjects may make a request for disclosure of their personal information (known as a data subject access request or subject access requests) and this may include CCTV images. How the Trust deals with subject access requests more generally is set out in the Data Protection Policy.
- 14.2. In order for us to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.
- 14.3. We will obscure images/footage of third parties or sensitive information when disclosing CCTV data as part of a subject access request, where we consider it necessary to do so.
- 14.4. Any request for copies of CCTV images/footage must be made to the DPO. This includes requests from external agencies (such as law enforcement, local authorities).

15. Legal basis for processing

- 15.1. Under data protection law the Trust must set out the bases it is relying on to make and use CCTV footage.
- 15.2. The Trust considers that the following bases are applicable:
 - 15.2.1. The Trust has a legitimate interest in using CCTV for the purposes described at paragraph 5 above. In addition, others, such as pupils, parents, and visitors to the School site, also have a legitimate interest in the Academy's use of CCTV (e.g. so that they are confident that the Trust sites are safe).
 - 15.2.2. The use of CCTV is not unfair because the Trust has put measures in place to safeguard the rights of individuals identifiable from CCTV, as described in this policy.
 - 15.2.3. The use of CCTV for the purposes described in paragraph 5 is also in the public interest.