



**Madni Academy**

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# CCTV Policy

**Approved by:** GB

**Date:** September 2023

**Last reviewed on:** September 2023

**Next review due by:** September 2025

**Data Protection  
Officer:** Abeda Khan

## **CCTV Policy**

### **Scope of this Policy**

Madni Academy is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people.

The purpose of this Policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) System at the Schools. It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the School and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the System).

The System is administered and managed by the School, who act as the Data Controller. This policy will be subject to review from time to time and should be read with reference to the School's GDPR Policy and Privacy Notices. For further guidance, please review the Information Commissioner's CCTV Code of Practice.

### **Aims**

The School's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the School believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.

To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.

To support the Police and community in preventing and detecting crime and assist in the identification and apprehension of offenders.

To monitor the security and integrity of the School site and deliveries and arrivals, including car parking.

To monitor staff and contractors when carrying out work duties.

To monitor and uphold discipline among pupils in line with the School Rules.

To aid in the investigation of accidents and incidents and the monitoring of health and safety.

Links to other policies

[GDPR Policy](#)

[Privacy Notice](#)

[E-Safety Policy](#)

[Safeguarding Policy](#)

[Information and Records Retention](#)

### **Positioning**

Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated aims.

Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.

No images will be captured from areas in which individuals would have a heightened expectation of

privacy, including changing and washroom facilities (unless clearly signed).

Members of staff will have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

No images of public spaces will be captured except to a limited extent at site entrances.

It is a requirement of the Data Protection Act 1998 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school ensures that this requirement is fulfilled.

CCTV footage may contain the personal information of those individuals captured by the recording. The cameras have been positioned in a way to ensure their security and to protect them from vandalism.

The School has ensured that the camera can produce images of the necessary clarity and quality to meet the School's purposes.

The CCTV sign includes the following:

That the area is covered by CCTV surveillance and pictures are recorded  
The purpose of using CCTV  
The name of the school  
The contact telephone number or address for enquiries

Example Sign



**WARNING**

**CCTV cameras in operation**

**Images are being monitored and recorded for the purpose of crime-prevention, the prevention of anti-social behaviour, the prevention of bullying, for the safety of our staff and students and for the protection of the school and its property. This system will be in operation 24 hours a day, every day. These images may be passed to the police.**

**This scheme is controlled by the school  
For more information contact 01924 500335**

## **Maintenance**

The CCTV System is operational 24 hours a day, every day of the year.

Administrative staff will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.

Maintenance and service is carried out twice yearly by **ADT Security Services**

## **Supervision of the System**

The CCTV system and the images produced by it are controlled by the DPO who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998).

Staff authorized by the School to conduct routine supervision of the System may include senior staff (SMT) and relevant staff on duty.

Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

## **Storage of Data**

The day-to-day management of images is the responsibility of the DPO who will act as the System Manager.

Images will be stored for approximately 30 days, and automatically over-written unless the School considers it reasonably necessary for the pursuit of the stated aims, or if lawfully required by an appropriate third party such as the Police or local authority.

Where such data is retained, it will be retained in accordance with the latest iteration of the Act and our Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered, and groups or individuals recorded, will be recorded in the Incident File.

## **Access to Images**

Access to stored CCTV images will only be given to authorised persons, under the supervision of the DPO, in pursuance of the stated aims (or if there is some other overriding and lawful reason to grant such access).

Individuals also have the right to access personal data the School holds on them (please see the School's Privacy Notice and Data Protection Policy), including information held on the System, if it has been kept.

The School will require specific details including at least the time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable please see **Appendix 2**.

The DPO must satisfy themselves of the identity of any person wishing to view stored images or access the System and the legitimacy of the request.

The following are examples when the DPO may authorise access to CCTV images:

Where required to do so by the Head, the Police or some relevant statutory authority;  
To make a report regarding suspected criminal behaviour;  
To enable the Designated Safeguarding Lead or deputy to examine behaviour which may give rise to any reasonable safeguarding concern;  
To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents will be informed as part of the School's management of a particular incident;  
To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out above;  
To the School's insurance company where required in order to pursue a claim for damage done to insured property; or  
In any other circumstances required under law or regulation.

Where images are disclosed (see above) a record will be made in the Incident File including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).

Where images are provided to third parties as described above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

A fee of £10 will be charged per request.

The School reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

### **Access to and Disclose of Images to Third Parties**

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the School where these would reasonably need access to the data (e.g. investigators).

Requests should be made in writing to the Data Protection Officer.

The data may be used within the School's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

If law enforcement agencies require the School to retain the sorted CCTV footage for possible use as evidence in the future, the information will be indexed and securely stored until it is needed.

CCTV footage may be disclosed in other circumstances if this is in accordance with data protection legislation. For example, if required by court order or if in connection with legal proceedings.

Applications received from outside bodies (e.g. solicitors) to view footage must be referred by staff to the Data Protection Officer/Headteacher.

CCTV footage will not be made available to the media for commercial or entertainment purposes. A record of all disclosures of CCTV footage will be kept.

### **Covert Monitoring**

All fixed cameras are in plain sight on the School premises and the School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds. The Admin Office retains a list of locations.

The schools may in exceptional circumstances set up covert monitoring. For example:

Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;

Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from the Head and agreed by the Bursar. Covert monitoring must cease following completion of an investigation. Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilets.

### **Other CCTV systems**

The School does not own or manage third party CCTV systems but may be provided by third parties with images of incidents where this is in line with the aims of the School's own CCTV Policy.

### **Complaints and queries**

Any complaints or queries in relation to the School's CCTV System, or its use of CCTV, or requests for copies, should be referred in the first instance to the Data Protection Officer.

For any other queries concerning the use of your personal data by the School, please see the School's GDPR policy or contact the School's Data Protection Officer.

### **Monitoring, Evaluation and Review**

This Policy is monitored, evaluated and reviewed on an annual basis by the Data Protection Officer.

Appendix 1: Checklist

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			
There is a named individual who is responsible for the operation of the system.			
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.			
Staff and members of the school community will be consulted about the proposal to install CCTV equipment.			
Cameras have been sited so that they provide clear images.			
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.			
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).			
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.			
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.			
Except for law enforcement bodies, images will not be provided to third parties.			
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.			
Regular checks are carried out to ensure that the system is working properly and produces high quality images.			

Appendix 2:

CCTV FOOTAGE ACCESS REQUEST

The following information is required before the School can provide copies of or access to CCTV footage from which a person believes they may be identified.

Please note that CCTV footage may contain the information of others that needs to be protected, and that the School typically deletes CCTV recordings after approximately 30 days.

Name and address: (proof of ID may be required)	
Description of footage (including a description of yourself, clothing, activity etc.)	
Location of camera	
Date of footage sought	
Approximate time (give a range if necessary)	
Signature* .....	Any other notes:
Print Name .....	
Date .....	