

CCTV POLICY

Mission Statement

WeST holds a deep seated belief in education and lifelong learning. Effective collaboration, mutual support and professional challenge will underpin our quest to ensure that all of the children and adults we serve are given every opportunity to fulfil their potential and succeed in life.

Person(s) responsible for updating the policy:	WeST IT Operations Lead
Date Approved:	Trust Board 17 October 2022
Date of next review:	October 2024
Status: Statutory / Non-statutory	Non-Statutory
Published on	WeST Website

Westcountry Schools Trust (WeST)

Westcountry Schools Trust (Trust) is a family of schools operating in the south west of England with schools located in Devon, Cornwall and Plymouth. Westcountry Schools Trust educates pupils from nursery to Sixth form across 27 bases and higher education students through The Learning Institute (for Trust sites see Annex A).

The purpose of this policy is to regulate the management and operation of video surveillance systems (CCTV) and automatic number recognition systems (ANPR) across Trust sites. It also serves as a notice and guide to data subjects (including pupils, parents, staff, governors, volunteers and visitors to school sites (including members of the public) regarding their rights in relation to personal data recorded on any Trust site. This policy has been designed to have regard to the requirements of the Surveillance Camera Code of Practice as set out by the Home Office in 2013 and associated guidance provided by the Commissioner. The code was most recently updated in January 2022, details can be found at: [Surveillance Camera Code of Practice \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Each CCTV System is administered and locally managed by individual school sites. The Trust acts as the Data Controller for all WeST sites for the purpose of data protection legislation.

This Policy will be subject to review from time to time, and should be read with reference to the Trust and individual school's Privacy Notice(s). For specific information relating to data protection rights and responsibilities please review the Information Commissioner's video surveillance guidance at: [Video surveillance | ICO](#)

Definitions within this policy:

"System Operator" – person or persons that take a decision to deploy a surveillance camera system, and/or are responsible for defining its purpose, and/or are responsible for the control of the use or processing of images or other information obtained by virtue of such system.

"System User" – person or persons who may be employed or contracted by the system operator who have access to live or recorded images or other information obtained by virtue of such system.

"Commissioner" is the role undertaken by the Surveillance Camera Commissioner, as set out in Protection of Freedoms Act 2012. To encourage compliance with the Surveillance Camera code of practice, it is the function of the Commissioner, appointed by the Secretary of State, to provide information and advice on all matters within the code relevant to surveillance camera systems.

The Trust's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals as set out in legislation, the Trust believes these

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purposes are all in its legitimate interests. Data captured for the stated objectives will not be used for any commercial purpose.

1. Objectives of the System

- 1.1 To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 1.2 To protect the site buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- 1.3 To support the police and wider community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- 1.4 To monitor the security and integrity of the individual site including but not limited to deliveries, site use outside normal working hours and site visitors.
- 1.5 To support the health, safety and wellbeing of our pupils, staff and onsite contractors.
- 1.6 To monitor and uphold discipline among pupils in line with the individual site pupil behaviour policy.
- 1.7 To support the process of managing allegations against staff, pupils and other members of the school community as defined in DfE statutory guidance Keeping Children Safe in Education (KCSIE).

2. Positioning

- 2.1 Camera locations have been selected, both inside and out, that the individual site reasonably believes require monitoring to address the stated objectives.
- 2.2 Adequate signage has been placed in prominent positions to inform staff, pupils, parents, volunteers, visitors and members of the public that they are entering a monitored area, identifying the Trust as the Data Controller and giving contact details for further information regarding the system.
- 2.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including staffrooms, changing and toilet facilities.

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- 2.4 No images of external public spaces or neighbouring properties will be captured except to a limited extent at site entrances.
 - 2.5 The location of cameras will be regularly reviewed by the system operator to ensure that systems continue to meet the stated objectives of this policy.
3. Maintenance
 - 3.1 The CCTV system will be operational 24 hours a day, every day of the year on each Trust site.
 - 3.2 The system operator at individual sites will check and confirm that the system is properly recording, images are of a suitable quality and that cameras are regularly checked and functioning correctly.
 - 3.3 The CCTV system will be checked and (to the extent necessary) serviced regularly.
4. Supervision of the System
 - 4.1 System users authorised by the individual school system operator to conduct routine supervision of the system may include IT teams, senior leaders and relevant staff with appropriate authority.
 - 4.2 Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of, or opportunity for access to images by unauthorised persons.
5. Storage of Data
 - 5.1 The day-to-day management of images will be the responsibility of site system operator, or such suitable person as the site system operator shall appoint in his or her absence.
 - 5.2 Images are stored securely for 14 days. Requests for access to CCTV images must be received within this time period.
 - 5.3 Images will be automatically over-written unless the individual site considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority to retain images beyond the stated retention period.
 - 5.4 Where such data is retained beyond the standard retention period, it will be retained in accordance with the relevant legislation and the Trust Data Protection Policy. Information including the date, time and length of the recording, as well

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as the locations covered, groups or individuals recorded and authority for retention will be listed in the system log book.

6. Access to Images

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

6.2 Individuals data subjects have the right to request access to the personal data the Trust holds on them (please see the WeST Data Protection Policy), including information held on the CCTV system, if it is available. The Trust will require specific details including Trust site, the time, date and camera location before it can properly respond to any such requests. (Annex A) This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

6.3 The system operator must be satisfied 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 system operator may authorise access to CCTV images:

6.3.1 Where required to do so by the Chief Executive Officer, a Senior Leader on site, the Data Protection Officer, the Police or some relevant statutory authority;

6.3.2 To make a report regarding suspected criminal behaviour;

6.3.3 To enable the site Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;

6.3.4 To assist school leadership in establishing facts in cases of unacceptable pupil behaviour or management of a particular incident;

6.3.5 To inform data subjects (or their legal representatives) pursuant to a subject access request under relevant data protection legislation and on the basis set out in 6.2 above;

6.3.6 To assist the Trust's insurance company where required in order to pursue a claim for damage done to insured property; or

6.3.7 In any specific circumstances required under legislation or regulation.

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- 6.4 Where images are disclosed under 6.3 a record will be made in the system log book 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). The system log will be made available to the commissioner on request.
- 6.5 Where images are provided to third parties under 6.3 above, all practicable steps will be taken to obscure images of non-relevant individuals.
7. Other CCTV systems
- 7.1 Individual sites may be provided with images of incidents by third parties where this in line with the objectives of the Trust's CCTV policy and/or its individual sites policies as appropriate.
- 7.2 Many pupils travel to Trust sites on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. Use of these images are governed by the company policies and may be provided to individual sites to assist in establishing facts in cases of unacceptable pupil behaviour, in which case the data subject and/or parent/guardian will be informed.
8. Complaints and queries
- 8.1 Any complaints or queries in relation to the Trust's use of CCTV or the systems in use at individual sites should be referred to the Principal /Headteacher at the individual site in the first instance.
- 8.2 Any complaints or queries in relation to the Trust's CCTV policy or the application of the policy at any individual Trust site should be referred to the Data Protection Officer in the first instance. DPO-West@westst.org.uk

Adoption of the Policy

This policy has been adopted by the Trustees of the Westcountry Schools Trust

Signed

Iain Grafton

Chair of Trust

Trust Board meeting Date 17 Oct 2022

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Annex A

CCTV FOOTAGE ACCESS REQUEST

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

Please note that CCTV footage may contain personal data that relates to others that the Trust as data controller is required to protect. WeST individual sites automatically delete CCTV recordings after 14 days.

Detail of request:	Notes
Name and address: (proof of ID may be required)	Please provide your name and address details. If requesting access to an image of a pupil for whom you have parental responsibility please provide details of their name and contact details. The Trust may be required to obtain the consent of a pupil before sharing information in line with the requirements of data protection legislation.
Trust site:	Please give details – full list of Westcountry Schools Trust settings provided in Annex B
Location of camera:	Please state exact location within the site.
Date of footage sought:	CCTV footage is retained for 14 days on Trust sites.
Approximate time: (give a range if necessary)	A time period will enable the system manager to identify the footage required more easily.
Date of request:	The retention period for CCTV images is short. Requests may be declined if images have already been deleted.

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Annex B

Westcountry Schools Trust Member	Site Address
Ashburton Primary School	Whistley Hill, Ashburton TQ13 7DW.
Atrium Studio School	Balland Lane, Ashburton TQ13 7EW
Austin Farm Academy	Delamere Road, Eggbuckland Plymouth PL6 5XQ
Boringdon Primary School	Courtland Crescent, Plympton, Plymouth. PL7 4HJ
Buckfastleigh Primary School	Bossell Road Buckfastleigh TQ11 0DD
Callington Community College	Launceston Road, Callington, Cornwall. PL17 7DR
Chaddlewood Primary School	Hemerdon Heights, Plympton, Plymouth. PL7 2EU
Coombe Dean School	Charnhill Way, Elburton, Plymouth. PL9 8ES
Eggbuckland Community College	Westcott Close, Eggbuckland, Plymouth PL6 5YB
Ermington Primary School	School Road, Ermington, Ivybridge. PL21 9NH
Glen Park Primary School	Glen Road, Plympton, Plymouth. PL7 2DE
Hele's School	Seymour Road, Plympton, Plymouth. PL7 4LT
Holbeton Primary School	The Square, Holbeton. PL8 1LT
Ivybridge Community College	Harford Road, Ivybridge. PL21 0JA
Manor Primary School	Manor Way, Ivybridge. PL21 9BG
Morley Meadow Primary School	51 Encombe Street Plymstock, Plymouth. PL9 7GN
Oreston Community Academy	27 Oreston Road, Plymstock, Plymouth. PL9 7JY
Plympton St Maurice Primary School	Plympton Hill, Plympton, Plymouth. PL7 1UB
Plymstock School	Church Road, Plymstock, Plymouth. PL9 9AZ
Sherford Vale School	Hercules Road, Sherford, Plymouth. PL9 8FA
South Dartmoor Community College	Balland Lane, Ashburton. TQ13 7EW
Stowford School	Exeter Road, Ivybridge. PL21 0BG
Ugborough Primary School	Ugborough, Ivybridge. PL21 0NJ
Wembury Primary School	Knighton Road, Wembury, Plymouth. PL9 0EB
Woodford Primary School	Litchaton Way, Plympton, Plymouth. PL7 4RR
Woodlands Park Primary School	Abbot Road, Ivybridge. PL21 9TF
Yealmpton Primary School	Stray Park, Yealmpton, Plymouth. PL8 2HF
Arena Sports Partnership	Callington CC, Launceston Rd, Callington PL17 7DR
The Learning Institute	Victoria Beacon Place, Station Approach, Victoria, Roche, Cornwall. PL26 8LG
Trust Head Office details	

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Westcountry Schools Trust	51 Encombe Street, Plymstock, Plymouth PL9 7GN