



CCTV Procedures

Responsible Officer: Andrew Hayward, Head of Estates & Facilities

Procedure Date: 16th January 2025

Review Date: January 2026 or where a change of regulations or organisation takes place

1. Introduction

Activate Learning Education Trust (ALET) is fully committed to the safety of its staff, students and visitors and to this extent has invested in the security systems to its buildings and facilities.

The purpose of this procedure is to regulate the management, operation and use of the closed-circuit television (CCTV) systems at Activate Learning Education Trust (ALET) premises. Common CCTV systems are based around digital technology and therefore need to be treated as information that will be processed under GDPR (General Data Protection Regulation) 2016. Each school setting has their own Data Protection Officer (DPO) who is ultimately responsible for the data protection within their setting (refer to the ALET GDPR Policy).

The system comprises of a number of fixed cameras located around each of the premises. All cameras may be monitored and are only available for use by approved members of staff and where applicable, police.

The CCTV systems are owned by Activate Learning Education Trust (ALET) and will be subject to review annually.

This Procedure applies to the following premises:

- UTC Reading
- UTC Heathrow
- UTC Swindon
- UTC Oxfordshire
- Theale Green School
- The Bicester School

2. Objectives of the CCTV System

The objectives of the CCTV systems are:

1. To enhance the personal safety of staff, students and visitors to reduce the fear of physical abuse, intimidation and crime as well as Safeguarding our students.
2. To protect Activate Learning Education Trust (ALET) buildings and assets to ensure they are kept free from intrusion, vandalism, damage or disruption.
3. To support the police in a bid to deter and detect crime.
4. To assist in identifying, apprehending and prosecuting offenders on the site.
5. To assist in the usage and management of the facility on a day-to-day basis.

3. Statement of Intent

The CCTV systems will be registered with the Information Commissioner under the terms of the GDPR 2016 and will seek to comply with the requirements, both of the GDPR 2016 and the Commissioner's Code of Practice (refer to the ALET GDPR Policy).

The Trust will comply with the GDPR 2016, whether it be information, recordings or downloads which relate to the CCTV systems. Cameras will be used to monitor activities within the Activate Learning Education Trust (ALET) buildings and external areas. These are to identify criminal activity occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the occupants, together with its visitors.

Materials or knowledge secured as a result of CCTV systems will not be used for any commercial purpose. Downloads will only be released to the media for use in the investigation of a specific

crime and with the written authority of the police. Downloads will never be released to the media for purposes of entertainment.

The planning and design of the existing CCTV systems have endeavoured to ensure that the CCTV systems will give maximum effectiveness and efficiency, but it is not possible to guarantee that the CCTV systems will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes where areas are covered by CCTV.

4. Operation of the System

The system will be administered and managed by the Headteacher of each setting, in accordance with the principles and objectives expressed in this procedure.

The day-to-day management will be the responsibility of the Headteacher for each setting. The CCTV systems will be operated 24 hours a day, every day of the year. Footage should be held for a maximum of 31 days, however individual school systems may vary.

5. CCTV System

An external approved Contractor will check and confirm the efficiency of the system on a regular basis and that the equipment is recording properly and the cameras are functional. Access to the CCTV recordings will be strictly limited to the members of staff approved by the Headteacher and Data controller.

6. Liaison

Liaison meetings may be held with all bodies involved in the support of the CCTV system i.e. maintenance contractors, approved staff, police etc.

7. Monitoring Procedures

Camera surveillance will always be maintained for safety and monitoring purposes.

8. Video Download Procedures

Recordings may be viewed by the police for the prevention and detection of crime. Permission to do this will be given by the Headteacher of the setting.

A record will be maintained of the release of downloads to the police or other authorised applicants. A register will be available for this purpose and kept by the Headteacher. Viewing of downloads by the police must be recorded in writing and documented in the register. Requests by the police can only be actioned in accordance with GDPR 2016 (refer to the ALET GDPR Policy).

Should a download be required as evidence, a copy may be released to the police under this procedure, described in the above paragraphs. Downloads will only be released to the police on the clear understanding that the disc remains the property of Activate Learning Education Trust (ALET), and both the disc and information contained on it are to be treated in accordance with this procedure. Activate Learning Education Trust (ALET) also retains the right to refuse permission for the police to pass the disc or any part of the information contained thereon to any other person.

Applications received from outside bodies (e.g. solicitors) in order to view or release downloads will be referred to the Headteacher. In these circumstances, downloads will normally be released

where satisfactory documentary evidence is produced. Evidence must show that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee of £100.00 can be charged in such circumstances. Footage will be held for a maximum of 31 days.

9. Breaches of the procedure (including breaches of security)

Any breach of this procedure by Activate Learning Education Trust (ALET) staff will be initially investigated by the Headteacher of the setting so that the appropriate action can be taken following our own policies. Any serious breach of the procedure will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach to prevent recurrence.

10. Assessment of the Scheme and CCTV Usage Procedure

Performance monitoring, including random operating checks, may be carried out by approved persons.

11. Complaints

Any complaints about the Activate Learning Education Trust (ALET) CCTV systems should be addressed to the Headteacher of the setting in the first instance who will investigate in accordance with Section 9 of this procedure. System issues resulting in complaints will be investigated and reviewed by the Head of Estates and Facilities (please refer to the ALET complaints policy).

12. Access by the Data Subject

The GDPR 2016 subjects' individuals (to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV. Requests for Data Subject Access should be made in writing to the Headteacher of the setting in the first instance in accordance with ALET GDPR policy.

13. Public Information

A copy of this procedure will be located on each schools website for information purposes.

14. System Maintenance and Monitoring

The system will be maintained in accordance with the General Data Protection Regulation (GDPR), enacted in 2016 and only maintained and monitored by companies who carry the relevant accreditation from the Security Systems and Alarm Inspection Body (SSAIB) or National Security Inspection (NSI).

It will be the responsibility of the Site Manager to liaise with the maintaining company for the reporting of faults on the system and any changes to the site which may affect the operation of the system. It will be the responsibility of the Site Manager to arrange regular system reviews with the maintaining company.

15. Summary of Key Points

- This CCTV usage procedure will be reviewed on an annual basis
- The CCTV systems are owned and operated by Activate Learning Education Trust (ALET)
- The CCTV systems will not be manned out of operating hours
- The CCTV systems cannot be accessed by visitors / members of the public, except by prior arrangement with the Headteacher providing good reason in writing
- Liaison meetings may be held with the police and other bodies
- Copies of downloads may only be viewed by authorised staff and the police

- Copies required as evidence will be properly recorded, witnessed and packaged before copies are released to the police
- Copies will not be made available to the media for commercial or entertainment reasons
- Any breaches of this procedure will be investigated by the Headteacher. An independent investigation will be carried out for serious breaches by the appointed person from the Trust
- Breaches of the procedure and recommendations will be reported
- The system will be maintained on a regular basis by an approved contractor
- CCTV footage should be kept for 31 days, although this may vary in each setting and may be deleted thereafter