





Lumen Learning Trust

Learning together for a brighter future

CCTV Policy

DATE APPROVED BY Lumen Learning Trust	30 th March 2023		
REVIEW DATE Biennial	30 th March 2025		
SIGNED EXECUTIVE PRINCIPAL	Mary Ellen McCarthy 	DATE	30 th March 2023
SIGNED CHAIR OF DIRECTORS	Ray Vango 	DATE	30 th March 2023

The Lumen Learning Trust puts the children's needs at the heart of its provision. Our whole school community is committed to enabling the children to become successful lifelong learners and happy, fulfilled adults who can make positive choices about their future.

Data Protection

Any personal data processed in the delivery of this policy will be processed in accordance with the school Data Protection Policy and can be found in the Record of Processing Activity.

Policy Statement

The Lumen Learning Trust uses Close Circuit Television ("CCTV") within the premises of every Trust school. The purpose of this policy is to set out the operation, use, storage and disclosure of CCTV at the Schools.

This policy applies to all data subjects whose image may be captured by the CCTV system. It works in concurrence with the Trust's Data Protection Policy, Record of Data Processing and Data Retention schedule.

The policy considers applicable legislation and guidance, including but not limited to;

- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act (DPA) 2018
- Video Surveillance Code of practice as produced by the Information Commissioner Office (ICO)
- Protection of Freedom Act (PoFA) 2012
- Human Rights Act 1998

The CCTV system is owned and operated by each school locally. The deployment is determined by the local Senior Leadership Team, with input from the Board of Governors and Data Protection Officer (DPO).

Each school will:

- Notify the ICO of its use of CCTV as part of its registration.
- Complete a Data Privacy Impact Assessment if amendments are to be made to the deployment or use of CCTV.
- Treat the system and all information processed on the CCTV system as data which is processed under DPA 2018/UK GDPR.
- Not direct cameras outside of school grounds onto private property, an individual, their property or a specific group of individuals. The exception to this would be if authorisation was obtained for Direct Surveillance as set up by the Regulatory of Investigatory Power Act 2000.
- Display Warning signs clearly in prominent places. Specifically, signs will be positioned at all external entrances of the school site where CCTV is in use. Additionally, signs should also be displayed in any public areas where a passer-by may be recorded. These signs will include information on how to contact the relevant school regarding information or access to the CCTV footage.
- There is no guarantee that any local system will or can cover and detect every single incident taking place in the areas of coverage.
- CCTV footage will not be used for any commercial purposes.

Camera Setup

The CCTV system at each school is comprised of a number of cameras which record day and night covering the internal and external areas of the School. Their coverage may also extend past the school boundaries to public areas.

Cameras will be placed so they only capture images relevant for the purposes for which they are installed, and all care will be taken to ensure that reasonable privacy expectations are not violated.

CCTV is not sited in classrooms and will not be used in such, except in exceptional circumstances.

Members of staff on request can access details of CCTV camera locations.

Purpose of CCTV

The Trust and its schools use CCTV for the following purposes:

- To provide a safe and secure environment for the school workforce, pupils and visitors.
- To protect the school buildings and assets.
- To assist in the prevention and detection of criminal activity.
- Assist law enforcement agencies in apprehending suspected offenders.

Covert Monitoring

The Trust and its schools retain the right in exceptional circumstances to set up covert monitoring. For example;

- Where there is good cause to suspect illegal or serious unauthorised action(s) are 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 Teacher and Chair of Governors.

Covert monitoring will cease following the completion of an investigation.

Storage and Retention

Recorded data will not be retained for longer than is necessary and, while retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of people whose images have been recorded.

All data will be stored securely;

- The monitor to view CCTV footage will be kept in a secure administrative area of the school building.
- Recordings are stored on a Network Video Recorder (NVR) locally at each school site.
- Recordings are stored until such time that the internal data storage limit of the NVR has been reached, at which point the earliest stored data will be overwritten. Specific data will only be retained for longer, defined periods of time where there is a specific purpose for which it is required.
- The CCTV NVR is not included within automatic back ups carried out at each site.

Access to CCTV Images

The ability to view live and historical CCTV footage is only to be provided at designated locations and by authorised persons.

Specific live monitoring and direct access to recorded footage is limited to the school office team, Premises Manager and the senior leadership team at each site.

Only in exceptional circumstances will any other individuals be allowed to view footage. The reasons for and details of these circumstances will be recorded at the time such a decision is made.

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by the school.

Disclosure of Images to Data Subjects (Subject Access Requests)

Any individual recorded in any CCTV image is considered a data subject and therefore has the right to request access to those images.

These requests will be considered a Subject Access Request and should follow the Trust's Subject Access Request process as found in our Data Protection Policy.

The trust will comply with the Data Protection legislation in regard to dealing with all data requests submitted in any format, although individuals are asked to preferably submit their request in written format to assist with comprehension.

They should include:

- Name of individual requesting the data
- Correspondence address
- Contact number and email address
- Details of the request

If you would like to exercise any of the rights or requests listed above, please contact Lumen Learning Trust's Data Manager via any of the following:

- datamanager@lumenlearningtrust.co.uk
- 01932 571217
- Lumen Learning Trust, Briar Road, Shepperton TW17 0JB

When such a request is made, the footage will be reviewed in accordance with the request.

If the footage contains only the data subject making the request, then the individual may be permitted to view the footage.

This will be strictly limited to the footage of the data subject making the request and the specific reason for the request.

If the footage contains images of other data subjects, then the relevant school will consider if;

- The request requires the disclosure of the images of data subjects other than the requester, and whether these additional data subjects can be anonymized from the footage.
- The other individuals in the footage have consented to the disclosure of the images or if their consent could be obtained.
- If not, then whether it is reasonable in the circumstances to disclose those images to the data subject making the request.

The School reserves the right to refuse access to the CCTV footage where this would prejudice the legal rights of other data subjects or jeopardise an ongoing investigation.

Disclosure of Images to Third Parties

The relevant school will only disclose record CCTV footage to third parties where there is a lawful basis to do so.

Third parties acting on behalf of a data subject will be handled in accordance with the Subject Access Request Policy.

CCTV footage will only be disclosed to law enforcement agencies in line with the purpose for which the CCTV system is in place.

If a request is received from a law enforcement agency for the disclosure of footage then the school will ask for an explanation of the reasoning for wanting to obtain the footage. This will assist in enabling proper consideration of the extent of what can appropriately be disclosed. If an order is granted by a court for the disclosure of CCTV images then this should be complied with but consideration must be given to exactly what the order requires.

In all instances, if there are any concerns as to what should or should not be disclosed then the Data Protection Officer will be contacted and further legal sought if necessary.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

If you remain unhappy, you may wish to contact our Data Protection Officer David Coy via david.coy@london.anglican.org.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/> Call 0303 123 1113 Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF