

## CCTV POLICY

<b>Person(s) responsible for updating the policy:</b>	DPO: Judicium ELT: Nat Parnell
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### WeST Vision, Mission and Values

[Westcountry Schools Trust - Our Vision, Mission and Values](#)

## CCTV Policy

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 31 bases. (for Trust sites see Annex B).

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.

## Objectives

Review of this policy shall be repeated regularly and whenever new equipment is introduced, a review will be conducted, and a risk assessment put in place. We aim to conduct reviews no later than every two years. The purpose of the CCTV system is to assist the trust and it's schools in reaching the following objectives:

- (a) To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety;
- (b) To protect the site buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public;
- (c) To support the police and wider community in preventing and detecting crime, and assist in the identification and apprehension of offenders;
- (d) 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;
- (e) To support the health, safety and wellbeing of our pupils, staff and onsite contractors;
- (f) CCTV will not be used for excessive or constant monitoring of pupils, but may be used where necessary and proportionate to uphold discipline in line with the school's pupil behaviour policy;
- (g) 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).

### Purpose of This Policy

The purpose of this policy is to regulate the management and operation and use of the CCTV system (closed circuit television) at the trust schools. 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.

CCTV cameras are not installed in areas in which individuals would have an expectation of privacy such as toilets, changing facilities, etc.

### Statement of Intent

CCTV cameras are installed in such a way that they are not hidden from view. We do not covertly record anyone. Signs are predominantly displayed where relevant so that staff, students, visitors and members of the public are made aware that they are entering an area covered by CCTV. The signs also contain contact details as well as a statement of purposes for which CCTV is used.

The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.

The Trust schools will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

The system has been designed so far as possible to deny observation on adjacent private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design have endeavored to ensure that the system will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system 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, will be clearly visible on each site and make clear who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

CCTV images are not retained for longer than necessary, taking into account the purposes for which they are processed. Data storage is automatically overwritten by the system after a period of 14 days.

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. In the absence of a compelling need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 6 months.

### System Management

Access to the CCTV system and data shall be password protected and will be kept in a secure area.

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.

Images will be viewed and/or monitored in a suitably secure and private area to minimize the likelihood of, or opportunity for access to images by unauthorized persons.

The CCTV system is designed to be in operation for 24 hours each day, every day of the year, on each trust site, though the school does not guarantee that it will be working during these hours.

The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that the cameras are functional.

Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by providing clear, usable images.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

### Access to Images

- (a) Access to stored CCTV images will only be given to authorized 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);
- (b) Individual 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 CCTV systems, 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.
- (c) 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 of when the system operator may authorise access to CCTV images:
  - a. Where required to do so by the Chief Executive Officer, a Senior Leader on site, Data Protection Officer, the Police or some relevant statutory authority;
  - b. To make a report regarding suspected criminal behaviour;
  - c. To enable the site Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
  - d. To assist school leadership in establishing facts in cases of unacceptable pupil behaviour or management of a particular incident;
  - e. 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 (b) above;

- f. To assist the Trust's insurance company where required in order to pursue a claim for damage done do insured property; or
  - g. In any specific circumstances required under legislation or regulation.
- (d) Where images are disclosed under (a) 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.
- (e) Where images are provided to third parties under (a) above, all practicable steps will be taken to obscure images of non-relevant individuals.

#### Downloading Captured Data on to Other Media

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings), any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures: -

- (a) Each downloaded media must be identified by a unique mark.
- (b) Before use, each downloaded media must be cleaned of any previous recording.
- (c) The System Manager will register the date and time of downloaded media insertion, including its reference.
- (d) Downloaded media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a downloaded media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.
- (e) If downloaded media is archived, the reference must be noted.
- (f) If downloaded media is put onto a device, the device will be encrypted, and password protected.

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, the Headteacher and other authorised senior leaders. However, where

one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable, if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the downloaded media (and any images contained thereon) remains the property of the school and downloaded media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media, this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the school to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until needed by the police.

Applications received from outside bodies (e.g., solicitors or parents) to view or release images will be referred to the school's Data Protection Officer and a decision made by a senior leader of the school in consultation with the school's Data Protection Officer.

### **Complaints About the Use of CCTV**

Any complaints 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.

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 WeST Data Protection in the first instance at [dpowest@westst.org.uk](mailto:dpowest@westst.org.uk)

### Requests for Access by the Data Subject

The Data Protection Act provides data subjects – those whose image has been captured by the CCTV system and can be identified - with a right to access data held about themselves, including those obtained by CCTV. 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.

Detail of request:	Notes
Name and address:  (proof of ID maybe 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.

Annex B

Westcountry Schools Trust Member	Site Address
Ashburton Primary School	Whistley Hill, Ashburton, Newton Abbot. TQ13 7DW
Austin Farm Academy	Delamere Road, Egguckland, Plymouth PL6 5XQ
Boringdon Primary School	Courtland Crescent, Plympton, Plymouth. PL7 4HJ
Buckfastleigh Primary School	Bossell Road, Buckfastleigh, Devon.TQ11 0DD
Callington Community College	Launceston Road, Callington, Cornwall. PL17 7DR
Camelford Primary School	Station Road, Camelford, Cornwall, PL32 9UE
Chaddlewood Primary School	Hemerdon Heights, Plympton, Plymouth. PL7 2EU
Coombe Dean School	Charnhill Way, Elburton, Plymouth. PL9 8ES
Egguckland Community College	Westcott Close, 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, Devon. PL8 1LT
Ivybridge Community College	Harford Road, Ivybridge, Devon. PL21 0JA
Manor Primary School	Manor Way, Ivybridge PL21 9BG
Morley Meadow Primary School	51 Encombe Street , Plymstock, Plymouth. PL9 8TQ
Oreston Community Academy	27 Oreston Road, Plymstock, Plymouth. PL9 7JY
Otterham Primary School	Camelford, Cornwall, PL32 9YW
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
Sir James Smith's School	School Bungalow, Dark Lane, Camelford, Cornwall, PL32 9UJ
South Dartmoor CC	Balland Lane, Ashburton, Devon. TQ13 7EW
St Breward Primary	St Breward, Bodmin, Cornwall, PL30 4LX
Stowford School	Exeter Road, Ivybridge, Devon. PL21 0BG

St Teath C P School	North Road, St Teath, Cornwall, PL30 3JX
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, Devon. PL21 9TF
Yealmpton Primary School	Stray Park, Yealmpton, Plymouth. PL8 2HF
Westcountry Schools Trust	51 Encombe Street, Plymstock, Plymouth. PL9 7GN

### Public Information

Copies of this policy will be available to the public from each Trust school office.

### Version History Log

Version	Description of Change	Date of Policy Release by WeST
1	Initial Draft	September 2019
2	Initial Draft changes made	September 2019
3	Initial Issue	September 2019
4	No changes	June 2022
5	Judicium template adopted and used	September 2025
6	Amendments made to objectives and access to images after feedback	November 2025