CCTV Policy

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Reason for Review/Revision:	Updated guidance
Publication Scheme	School websites
Version	V2
Lead	Headteacher

CCTV policy

Thorntree Academy uses closed-circuit television (CCTV) in order to protect the safety of students, staff, parents/carers and visitors.

This policy outlines how the Thorntree Academy uses CCTV in line with the principles set out within the Surveillance Camera Code of Practice 2021. All personal data obtained is stored in accordance with UK General Data Protection Regulations (UKGDPR) and Data Protection Act 2018.

Purpose

The CCTV recordings may be used for:

- prevention and detection of crimes, in the Thorntree Academy and on the premises
- student behaviour management, discipline and exclusions
- staff disciplinary and associated processes and appeals
- maintaining a safe environment for the whole Thorntree Academy community

Processing may also be carried out under the recognised legitimate interest basis introduced by Data (Use and Access) Act 2025 specific to supporting safeguarding, crime prevention and public safety.

CCTV system operation

The CCTV system will be operational 24 hours a day, 365 days a year.

The Data Controller is registered with the Information Commissioner's Office.

The system does not record audio.

All recordings will have date and time stamps.

Location of cameras

The cameras are located in places that require monitoring in order to achieve the purpose of the CCTV system.

Appropriate signs are displayed around the Thorntree Academy premises within prominent locations that clearly identifies that CCTV recording is in operation.

Signs are located at the entrance gate, building entrance and inside reception. Signs informing the public that CCTV is in operation are displayed on external windows around school premises.

General access to CCTV footage

It will not be common practice to release CCTV footage unless satisfactory evidence for a secure legal basis can be provided. This is authorised within Section 115, Crime and Disorder Act 1998.

In appropriate circumstances, the Thorntree Academy may allow authorised personnel to view footage where the above purposes are considered.

The Thorntree Academy will maintain a record of all disclosures.

All requests for access should made in writing to the system manager Paul Watson, headteacher and be specific to a date and time frame.

Any disclosure will be done in line with UK GDPR and Data Protection.

The Thorntree Academy cannot guarantee disclosure of footage when made under a Subject Access Request due to:

- lack of technical resources available in order to blur or redact the footage
- the release of footage would prejudice an ongoing investigation
- other identifiable individuals have not consented

Authorised CCTV system operators

The Thorntree Academy has limited staff members, who are fully trained and understand the importance of confidentiality, authorised to access and operate the CCTV system.

The authorised personnel within Thorntree Academy are:

Paul Watson, headteacher – system manager

Karen O'Rourke, school business manager

Steve Harbron, site supervisor

Storage of footage

Footage will be retained for no longer than necessary to achieve the purposes of the system.

The retention period will be 30 days. At the end of the retention period, the files will be overwritten.

On occasion footage may be retained for longer than 30 days. For example, where a law enforcement body is investigating a crime.

Recordings will be downloaded and encrypted, so that the data will be secure, and its integrity maintained, to ensure it can be used as evidence if required.

All recordings must be logged and traceable throughout their life within the system.

CCTV system security

A full Data Privacy Impact Assessment will be completed upon deployment, replacements, development or upgrading of the CCTV system. This is in line with the UK GDPR principle, Privacy by Design, and ensures the aim of the system is reasonable, necessary and proportionate.

The system will be made secure by the following safeguards:

- the system manager will be responsible for overseeing the security of the footage and recorded images, maintenance and training of authorised personnel
- the system will be check for faults each periodically by external provider
- the footage will be stored securely and encrypted
- the software updates will be installed as soon as possible
- the recorded footage will be password protected
- the equipment will be located in a secured lockable enclosure accessible only to authorised personnel
- adequate cyber security measures will be in place to protect footage from cyber-attacks
- a register of authorised staff is maintained, reviewed and updated when necessary

Covert recording

The Thorntree Academy will only 'covert record' when the following criteria are met:

- an assessment concluded that if we had to inform individuals that recording was taking place it would prejudice our objective
- there is reasonable cause to suspect specific criminal activity or actions that could result in a serious breach of staff or volunteer behaviour expectations is taking place

- covert processing is carried out for limited and reasonable period of time and related to specific suspected criminal activity
- if the situation arises where the Thorntree Academy adopts 'covert recording', there will be a clear documented procedure which sets out how the decision to record covertly was reached, by whom and the risk of intrusion on individuals

Complaints

Any complaints should be made in writing to the system manager:

- Paul Watson
- Email address: thorntree@thorntreeacademy.org.uk

Review and monitoring

Appropriate changes will be made accordingly in line with changes to legislation.

The headteacher will communicate changes to all authorised staff members.

Scheduled review date is March 2027.