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.

Westcountry Schools Trust adopted this policy in September 2019

Westcountry Schools Trust will review this policy annually

Westcountry Schools Trust (WeST)

Westcountry Schools Trust (the **Trust**) is a family of schools operating in the south west with schools located in Devon, Cornwall and Plymouth. Westcountry Schools Trust educates pupils from nursery to Sixth form across 13 bases and higher education students through The Learning Institute (for Trust sites see Annex 1).

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System across the Trust. It also serves as a notice and a 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 via the CCTV system on any Trust site.

Each CCTV System is administered and locally managed by individual school sites. The Trust acts as the Data Controller for all 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 guidance, please review the Information Commissioner's CCTV Code of Practice at https://ico.org.uk/for-organisations/guide-to-data-protection-1998/encryption/scenarios/cctv/

All fixed cameras are in plain sight on school premises and schools do not routinely use CCTV for covert monitoring or monitoring of private property outside the site grounds.

The Trust's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the Trust believes these purposes are all in its legitimate interests. Data captured for the purposes below 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 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 deliveries and arrivals.

   1.5   To support the health, safety and wellbeing of our pupils, staff and contractors.

   1.6   To monitor and uphold discipline among pupils in line with the individual site acceptable behaviour policy, which is available to parents and pupils on request.

   1.7   To support the process of managing allegations against staff as defined in DfE statutory guidance - Keeping children safe in education.

2. **Positioning**

   2.1   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.

   2.4   No images of public spaces will be captured except to a limited extent at site entrances.

2.5 The location of cameras will be regularly reviewed to ensure that systems continue to meet the stated objectives.

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 manager at individual sites will check and confirm that the system is properly recording, images are of a suitable quality and that cameras are functioning correctly, on a regular basis.

3.3 The system will be checked and (to the extent necessary) serviced regularly.

4. **Supervision of the System**

4.1 Staff authorised by the individual school 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 unauthorised persons.

5. **Storage of Data**

5.1 The day-to-day management of images will be the responsibility of site system manager, or such suitable person as the site system manager shall appoint in his or her absence.

5.2 Images are stored for approximately two weeks, and 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.

5.3 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 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 manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

6.2 Individuals also have the right to request access to the personal data the Trust holds on them (please see the Data Protection Policy), including information held on the 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. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

6.3 The system manager 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 manager 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 Police or some relevant statutory authority;

6.3.2 To make a report regarding suspected criminal behaviour;

6.3.3 To enable the 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 the school in establishing facts in cases of unacceptable pupil behaviour or management of a particular incident;

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

6.3.6   To 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 other circumstances required under law or regulation.

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).

6.5   Where images are provided to third parties under 6.3 above, wherever 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 polices 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. Individual sites may use these in establishing facts in cases of unacceptable pupil behaviour, in which case the parents/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.

CCTV FOOTAGE ACCESS REQUEST

Westcountry Schools Trust (WeST)

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

Please note that CCTV footage may contain the information of others that needs to be protected, and that individual Trust sites automatically delete CCTV recordings after approximately two weeks.

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 is 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 A
Location of camera:	Please state exact location within the site.
Date of footage sought:	CCTV footage is generally retained for a maximum of 2 weeks 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 A

Westcountry Schools Trust Member	Site Address
Callington Community College	Launceston Road, Callington, Cornwall. PL17 7DR
Coombe Dean School	Charnhill Way, Elburton, Plymouth. PL9 8ES
Dunstone Primary School	Shortwood Crescent, Plymstock, Plymouth. PL9 8TQ
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
Oreston Community Academy	27 Oreston Road, Plymstock, Plymouth. PL9 7JY
Plymstock School	Church Road, Plymstock, Plymouth. PL9 9AZ
Sherford Vale School	Hercules Road, Sherford, Plymouth. PL9 8FA
Stowford School	Exeter Road, Ivybridge, Devon. PL21 0BG
Wembury Primary School	Knighton Road, Wembury, Plymouth. PL9 0EB
Woodlands Park Primary School	Abbot Road, Ivybridge, Devon. PL21 9TF
Yealmpton Primary School	Stray Park, Yealmpton, Plymouth. Pl8 2HF
The Learning Institute	Victoria Beacon Place, Station Approach, Victoria, Roche, Cornwall. PL26 8LG
Additional member from September 2019	
Boringdon Primary School	Courtland Crescent, Plympton, Plymouth. PL7 4HJ
Chaddlewood Primary School	Hemerdon Heights, Plympton, Plymouth. PL7 2EU
Glen Park Primary School	Glen Road, Plympton, Plymouth. PL7 2DE
Plympton St Maurice Primary School	Plympton Hill, Plympton, Plymouth. PL7 1UB
Woodford Primary School	Litchaton Way, Plympton, Plymouth. PL7 4RR