

Title	Closed Circuit Television (CCTV)
Associated Policies	<ul style="list-style-type: none"> Data Protection (TPO/STA/25)

REVIEWED: February 2019

NEXT REVIEW: February 2022

1. Policy Statement

- 1.1 Brooke Weston Trust operates CCTV systems for the safety of staff, students and visitors and the protection of Trust assets.
- 1.2 Cameras are sited appropriately at each academy and the extent of their field of view does not extend beyond the bounds of each property.
- 1.3 Physical access to CCTV systems and their footage is restricted to those directly responsible for the operation of the systems. All requests to view camera footage are logged and approval is granted only where the request is clearly in line with statement 1.1 of this policy.
- 1.4 External requests to access camera footage i.e. from the Police will only be approved where the appropriate legal platform for the request is cited and appropriately documented.

2. Who does this policy apply to?

- 2.1 This policy applies to the entire Brooke Weston Trust community; trustees, directors, governors, staff, students, parents and carers and anyone seeking to become a member of that community.

3. Who is responsible for carrying out this policy?

- 3.1 The implementation of this policy will be monitored by the Strategic Delivery Group and will remain under constant review by the Brooke Weston Trust.

4. What are the principles behind this policy?

- 4.1 Brooke Weston Trust operates all of its premises in accordance with UK law. The Trust's CCTV systems comply with the Information Commissioners Office document "In the picture: a data protection code of practice for surveillance cameras and personal information" (<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>) and the Data Protection Act (2018).
- 4.2 Brooke Weston Trust is committed to the safety of staff, students, parents and visitors on all its premises.
- 4.3 As a public body Brooke Weston Trust has a duty to protect assets purchased by UK taxpayers.

5. Procedures

- 5.1 All premises using CCTV will display signage to indicate the presence of the CCTV system in accordance with the code of practice. This signage should identify the Trust as the body to whom Subject Access requests are to be made and provide a postal and email address to receive such requests.
- 5.2 Each academy in the Trust will record all requests to view CCTV footage including the identity of the requester, the date of request and the outcome of the approval process including the date of disclosure of footage where approved. The requests must be forwarded to the relevant academy Principal for approval.
- 5.3 Requests from external organisations will be recorded as in 5.1 above but will also include a statement of the legal platform on which the request has been made and the appropriate documentation backing the request.
- 5.4 Subject Access requests made under the Data Protection Act (2018) by members of the public, parents or staff must be recorded and forwarded to the Trust Data Controller. The date, time, location of the

requested footage and identity of the requester must be recorded as well as a full record of the request made (i.e. letter or email received).

- 5.5 Footage exported from the CCTV system for any purpose other than for handover to the Police must be reviewed to ensure that the rights of those depicted in the footage are protected. If there is any doubt such cases must be referred promptly to the Trust Data Controller.
- 5.6 Any footage extracted from the system must be signed out to the requester and must be tracked until it is returned and destroyed. The exception to this is any footage handed to the Police who are responsible for the footage from the point of handover
- 5.7 The retention period of footage from all Trust CCTV systems is 14 days. After this time footage will be deleted. Footage related to incidents under investigation may be retained until the investigation is completed and any follow up action is complete after which it must be deleted.
- 5.8 The request log for each academy and the retention practices will be reviewed at least quarterly by the Trust Data Controller and representatives of the academy to ensure the validity of approvals to review footage.

6. Policy Review

- 6.1 This policy will be reviewed annually as part of the Trust's annual review process.