

This is a Category 1 Policy (Full Delegation)

This policy is in force until further notice from:	May 2024		
This policy must be reviewed by:	October 2024		
Policy Author(s):	Matt Hassall & Shamita Kumar		
Date policy reviewed by ComplianceOfficer:	April 2023		
Date compliance with GDPR assured:	April 2024		
Location of publication of policy:	The Trust Website/ Governor Hub/ Internal Records & Intranet		
Under the Scheme of Delegation this policy must be approved by	Audit & Risk Committee		
Such approval was given on:	May 2024		

This is the closed-circuit television (CCTV) Policy of Avanti Schools Trust and Trust Schools. This policy outlines how the Trust and its Schools uses CCTV and processes the personal data obtained in accordance with data protection laws.

The Trust and its Schools use CCTV and the images/ recordings produced to:

- prevent or detect crime;
- keep its pupils, staff, and visitors in a safe and secure environment;
- prevent damage to the school property and its surroundings.

This CCTV policy is intended to assist staff in complying with their own legal obligations when working with personal data.

For the purposes of this policy, the following terms have the meanings provided below:

- 2.1. : means fixed and domed cameras designed to capture and record images of individuals and property.
- 2.2. : is information which is stored electronically, or in certain paper-based filing systems. In respect of CCTV, this generally means video images. It may also include static pictures such as printed screen shots.
- 2.3. : means all living individuals about whom The School hold personal information as a result of the operation of our CCTV (or other surveillance systems).
- 2.4. : means data relating to a living individual who can be identified from that data (or other data in our possession). This will include video images of identifiable individuals.
- 2.5. : are the School. The School are responsible for establishing practices and policies to ensure compliance with the law.
- 2.6. : are authorised members of staff whose work involves processing personal data. This will include those whose duties are to operate CCTV cameras and other surveillance systems to record, monitor, store, retrieve and delete images. Data users must protect the data they handle in accordance with this policy and our Data Protection Policy.
- 2.7. : are any person or organisation that is not a data user (or other employee of a data controller) that processes data on our behalf and in accordance with our instructions (for example, a supplier which handles data on our behalf).
- 2.8. : is any activity which involves the use of data. It includes obtaining, recording or holding data, or carrying out any operation on the data including organising, amending, retrieving, using, disclosing or destroying it. Processing also includes transferring personal

OCTV cameras are used by the Trust and its Schools to view and record individuals on and around its premises. This policy outlines why OCTV is in use, how OCTV will be used and how the data recorded by OCTV cameras will be processed to ensure compliance with data protection law and best practice. This policy also explains how to make a subject access request in respect of personal data created by OCTV.

The Trust and its Schools recognises that information held about individuals is subject to data protection legislation. The CCTV images it records of individuals in its buildings and on its grounds are personal data and therefore subject to the legislation. The Trust and its Schools are committed to complying with their legal obligations and seek to comply with best practice suggestions from the).

This policy covers all pupils, members of staff, volunteers, visitors SSC members SW Hub Governance Board members and Trustees.

This policy does not form part of the terms and conditions of any employment or other contract and may be amended at any time.

This policy has been agreed and implemented by the Board of Trustees and will be regularly reviewed to ensure that it meets legal requirements and relevant guidance published by the ICO.

OCTV monitors the interior, exterior of buildings, and the entrances 24 hours a day.

Camera locations are chosen to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring. As far as practically possible, CCTV cameras will not focus on areas expected to be private, for example, toilets, changing cubicles, changing areas, etc.

Surveillance systems will not be used to record sound.

Images are monitored by authorised members of staff in the course of their duties.

Staff using surveillance systems will be given appropriate training to ensure they understand and observe the legal requirements related to the processing of relevant data.

The Trust and its Schools will ensure that signs are displayed at the entrance of the surveillance area to alert individuals that their image may be recorded.

Such signs will contain:

- details of the organisation operating the system
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- who to contact for further information, where these things are not obvious to those being monitored.

Live feeds from CCTV cameras will only be monitored where this is reasonably necessary, for example to protect health and safety. The Trust and its Schools will ensure that live feeds from cameras and recorded images are only available to approved members of staff whose role requires them to have access to such data. This may include HR staff involved with disciplinary or grievance matters.

The School recognises that, in rare circumstances, individuals may have a legal right to object to processing and in certain circumstances to prevent automated decision making (see Articles 21 and 22 of the General Data Protection Regulation). For further information regarding this, please contact The Trust Compliance Officer.