



DIOCESE OF SOUTHWELL  
& NOTTINGHAM

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MULTI ACADEMY TRUST

# **SNMAT**

## **Security Camera Policy**

**A reference policy for SNMAT schools**

<b>Policy:</b>	Security Camera Policy – A reference policy for SNMAT schools
<b>Prepared For:</b>	Operations and Business Managers
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<b>VERSION</b>	<b>DATE</b>	<b>AUTHOR</b>	<b>CHANGES</b>
2024	SEPT 2024	MJH – Trust IT Manager	Based upon SCA policy. Thanks to Donna Barnes. Converted to a template and expanded.  Added Keeping Children Safe in Education 2024.
2025	APRIL 2025	MJH	Highlighted required changes. Minor formatting changes.
2026	FEB 2026	MJH	Added Data Protection to include Biometric and Special Category Data processing and the need for a DPIA.

## **CUSTOMISATION**

This isn't a uniform Security Camera Policy for academies. Each school should customise this policy and implement it as they see fit. They are tasked with notifying all staff and parents of the school's security systems and surveillance procedures. For parents, this can be given out when enrolling their children or published on the school website or handbook.

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## **EXECUTIVE SUMMARY**

At Cotgrave Church of England Primary School we take our responsibility towards the safety of staff, visitors and students very seriously. We expect all people to behave responsibly and safely but use security cameras to safeguard school assets and monitor any instances of aggression or physical damage to our site and our community.

## **RATIONALE**

The purpose of this policy is to manage and regulate the use of the security camera systems at the academy. It is to ensure that we comply with relevant legislation and that systems are secure and suitable for purpose.

## **SCOPE**

This policy covers the use of security camera systems on the Academy estate where [VIDEO, IMAGE AND AUDIO] are recorded and viewed of individuals who could be identified, as well as information relating to individuals for any of the following purposes:

- Protecting the school buildings and school assets, both during and after school hours;
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- Assisting in the investigation of safeguarding incidents, accidents and other incidents;
- Using video, images or audio that could affect their privacy;
- Supporting the Police or other agencies in a bid to deter and detect crime;
- To provide a safe and secure environment for pupils, students, staff and all visitors.

## **ROLES & RESPONSIBILITIES**

### **LOCAL GOVERNING BODIES**

1. It is the responsibility of the governing body to ensure there is management of security cameras within the school and the school meets the relevant statutory legislation requirements.

### **THE PRINCIPAL/HEADTEACHER**

2. It is the responsibility of the principal/headteacher to ensure that the day-to-day effectiveness of this policy school is maintained.
3. The principal/headteacher must ensure that adequate and effective consultation, notification and training is provided to staff to understand and adhere to the policy and its procedures.
4. The principal/headteacher must ensure that the authorisations and locations of access to cameras and locations as detailed in the appendices are enacted and supported in an effective manner.

## **GDPR**

The Diocese of Southwell and Nottingham Multi Academy Trust (SNMAT) is the corporate body registered with the Information Commissioners' Office as a Data Controller.

The security camera system is owned and operated by the school and the deployment of which is determined by the school's headteacher. The security camera is a standalone system and operated by the school.

## LEGISLATION

This policy has due regard to legislation including, but not limited to, the following:

- Regulation of Investigatory Powers Act 2000
- Protection of Freedoms Act 2012
- The UK General Data Protection Regulation
- Data Protection Act 2018
- Freedom of Information Act 2000
- The Education (Student Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- School Standards and Framework Act 1998
- Children Act 1989
- Children Act 2004
- Equality Act 2010
- Keeping Children Safe in Education 2024

This policy has been created regarding the following statutory and non-statutory guidance:

- Home Office (2013) 'The Surveillance Camera Code of Practice'
- ICO (2021) 'Guide to the UK General Data Protection Regulation (UK GDPR)'
- ICO (2017) 'In the picture: A data protection'

## OPERATION

The use of the security camera system will be conducted in a professional, ethical and legal manner and any diversion of the technologies for other purposes is prohibited by this policy e.g. Cameras will not be used for monitoring employee performance.

Monitoring of restricted access areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the academy, including Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other educational and related legislations.

- The Academy will only use security cameras for the safety and security of the site and its staff, students and visitors.
- Adequate signage will be placed so all members of the academy community are aware that they are entering an estate which is covered by security camera equipment.
- The Academy will only use security cameras as a deterrent [AND CAMERAS WILL NOT BE USED IN TOILETS OR CHANGING FACILITIES].

## ACCESS TO DATA

Access to the camera system, live data and historical data will be restricted to authorised personnel only. The system can only be accessed by username and password encryption with multi-factor authentication where possible on authorised devices. The system software keeps a log of when the authorised user accesses the system or stored media.

## **ACCESS AUTHORISATIONS**

All authorised operators with access to recorded images are aware of the procedures that need to be followed when accessing the images. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

In relevant circumstances, security camera footage may be accessed:

1. By the police where the academy is required by law to make a report regarding the commission of a suspected crime;
2. Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on school's property;
3. To the HSE and/or any other statutory body charged with child safeguarding; or
4. To assist the Headteacher or member of SLT, DSL in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed;
5. To data subjects (or their legal representatives), pursuant to a Subject Access Request;
6. To individuals (or their legal representatives) subject to a court order;
7. To the school insurance company where the insurance company requires evidence in order to pursue a claim for damage done to the insured property.

## **DATA RETENTION**

The camera system is configured to retain footage for **[SPECIFY PERIOD]** after which it will be automatically deleted.

If the footage is required specifically for an investigate or prosecution in that issue, then data will be stored in a secure environment.

Access to any data will be restricted to authorised staff only.

In certain circumstances, the recordings may also be viewed by other individuals to achieve the objectives set out above. When security camera recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

## **MAINTENANCE**

The responsibility for maintenance of the camera security system lies with the Academy.

## MANAGEMENT & CONFIGURATION

The Headteacher/Principal should work closely with the Site Team, DSL and IT Support Team and service providers to ensure that the camera security system meets with the needs of the academy.

The responsibility for determining where cameras are located, how they operate and the configuration of systems and lies with The Headteacher/Principal.

System specific training and support may be obtained from security camera providers, or the IT Support teams.

## DATA PROTECTION

Data collected from Security Camera systems will be:

- Processed lawfully, as determined by a DPIA, or from advice from the DPO. In less common circumstances, lawful processing will be determined by a legitimate interests assessment (LIA).
- Processed fairly, in a manner that people would reasonably expect, and considering advancements in technology that may not be anticipated by some people.
- Processed in a transparent manner, meaning that people are informed when their data is being captured.
- Collected for specified and legitimate purposes – data will not be processed further in a manner that is incompatible with the following purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Data will be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures. The use of surveillance cameras and biometric systems will be analysed using a DPIA, in consultation with the Academy Data Protection Coordinator and MAT Data Protection Officer.

A DPIA will be carried out prior to the installation of any surveillance, CCTV, or biometric system. A DPIA will:

- Describe the nature, scope, context, and purposes of the processing.
- Assess necessity, proportionality, and compliance measures.
- Identify and assess risks to individuals.
- Identify any additional measures to mitigate those risks.

Sensitive data obtained via biometric technology will be processed via special conditions (listed in Article 9 of the UK GDPR)

## DATA STORAGE AND SECURITY

Where used, UniFi Protect CCTV systems store data locally on the school's network video recorders. When client devices connect to UniFi they do so on end-to-end encrypted channels. This prevents unauthorised interception of video feeds as they travel across networks.

## **CONSENT AND NOTIFICATION**

A copy of this policy will be provided on request to staff, students, parents and visitors to the school and will be made available on the school website.

Signs will be placed on the premises where the surveillance is active as mandated by the ICO's Code of Practice.

## **COMPLAINTS**

Complaints and enquiries about the operation of security cameras within the academy should be directed to the Principal/Headteacher in the first instance.

## **REVIEW AND MONITORING**

The application and outcomes of this policy will be monitored and reviewed annually to ensure it is working effectively.

## APPENDIX 1 – STAFF ACCESS RIGHTS

Access	Staff Members	Note
FULL	SLT, DSL & IT SUPPORT TEAM	

## APPENDIX 2 – CAMERA LOCATIONS & TYPES

TYPE	LOCATION	AUDIO	RECORDING	SWIVEL/FIXED
G3 Flex	PLAYGROUND	Y	Y	F
G3 Flex	Reception	Y	Y	F
G3 Flex	Library	Y	Y	F
G3 Flex	School Hall	Y	Y	F
G3 Flex	Class 1	Y	Y	F
G3 Flex	Class 2	Y	Y	F
G3 Flex	Class 3	Y	Y	F
G3 Flex	Class 4	Y	Y	F
G3 Flex	Flourish Room	Y	Y	F
G3 Flex	Corridor outside Class 4	Y	Y	F