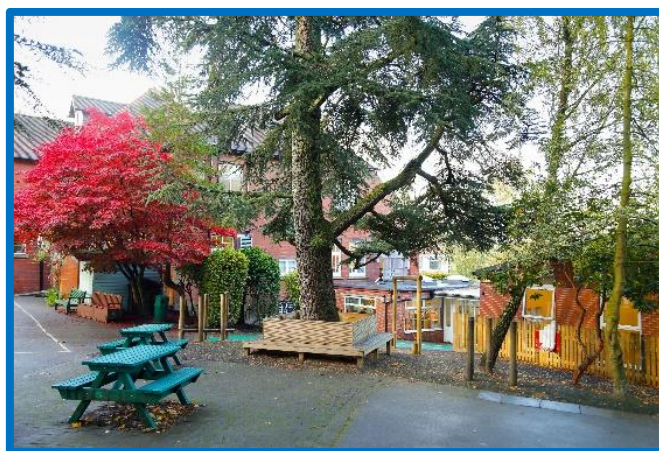




SURVEILLANCE POLICY



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Next review	March 2027	

INTRODUCTION

This policy concerns our use of surveillance technology and related processing of personal data. It is written in accordance with data protection and human rights legislation and relevant codes of practice.

Surveillance is the close observation or monitoring of individuals or spaces, for the purpose of influencing behaviour or protecting people. We only use surveillance in the context of CCTV & e-monitoring software. We do not operate covert surveillance technologies and therefore this policy does not cover the use of such technology.

CCTV

We operate Closed Circuit Television (CCTV) systems to:

- Protect school buildings and property
- Protect the safety and wellbeing of pupils, our workforce and visitors
- Deter and discourage anti-social behaviour such as bullying, theft and vandalism
- Monitor compliance with school rules and policies
- Support the police in the prevention, detection, investigation and prosecution of any crimes.

Please refer to separate CCTV Policy for a more details on how Brackenfield School uses our CCTV.

E-MONITORING

We operate e-safety monitoring software systems to:

- Safeguard our pupils and staff
- Promote wellbeing and early intervention
- Ensure appropriate use of school assets and resources
- Monitor compliance with school rules and policies

The school uses SOPHOS.

PRIVACY RISK ASSESSMENT

Under the UK GDPR, we are required to consider and address privacy implications to data subjects when implementing new data processing systems. This is known as privacy by design. The usual method for assessing privacy risks to individuals is by carrying out a Data Protection Impact Assessment (DPIA).

A DPIA is mandatory for surveillance activities since they are deemed particularly intrusive. We will ensure that DPIAs have been completed for both CCTV and e-monitoring and that there are no unmitigated high risks to the rights and freedoms of data subjects. In addition, we will review and update the relevant DPIA if we substantively change our systems.

CONTRACT MANAGEMENT

We are required to have contracts with any data processors we use, containing certain data processing clauses prescribed by law. We will ensure that we have implemented an appropriate contract with the providers of our CCTV, e-monitoring to allow for them storing, monitoring or accessing the data on our behalf. We will only agree to these contracts where they have been assessed for compliance and determined to meet our requirements.

TRANSPARENCY

The use of CCTV systems is visibly signed. Signage will include the purpose of the system, the name of the organisation operating the system and details of who to contact about the system. The signage will be clear and kept unobstructed, so that anyone entering the area will be aware that they are being recorded.

More detailed information about use of CCTV must also be provided via a Privacy Notice, which must also inform data subjects about their rights in relation to their surveillance data. We have included the mandatory privacy information to data subjects in our relevant privacy notices.

ACCESS CONTROLS

Surveillance system data will only be accessed to comply with the specified purpose. For example, footage of CCTV systems intended to prevent and detect crime will only be examined where there is evidence to suggest criminal activity has taken place. Logs of e-monitoring systems intended to safeguard children will only be examined where there is reasonable cause to believe a child is at risk.

Each system will have proportionate access controls and a nominated Information Asset Owner (IAO) who will be responsible for the governance and security of the system. The IAO may authorise other specified staff members to access data held on the systems routinely or on an ad-hoc basis.

DISCLOSURES

A request by an individual for surveillance data held about them will be treated as a subject access request (SAR). For more information on data subjects' right of access to their information, please refer to our Data Protection Policy.

If we receive a request for surveillance data from an official agency, such as the police, then we will confirm the purpose of the request and their lawful basis for accessing the data. We may also require formal documentation in support of the request. We will liaise with our Data Protection Officer (DPO) if we have any concerns about such requests.

RECORD OF PROCESSING AND RETENTION

We have a duty under Article 30 of the UK GDPR to ensure that all our data processing activities are recorded for accountability purposes. We maintain an Information Asset Register to fulfil this requirement. We will ensure that the use of surveillance systems is detailed on this register.

Surveillance records will only be held as long as necessary to fulfil the specific purpose and deleted in line with our Records Management Policy.

REVIEWS

CCTV systems must be reviewed annually to ensure that systems still comply with data protection legislation and national standards. The IAO should use the checklist included in Appendix A of this policy to complete this review.

The school should review the e-monitoring systems regularly by undertaking a review of the DPIA and updating the DPIA to reflect any changes in how the system is used or the type of data that is collected.

It is the responsibility of the relevant IAO to ensure reviews are completed and evidence of this is maintained.

COMPLIANTS

Complaints by individuals about the use of surveillance systems or data will be treated as a data protection concern. For more information on data protection complaints, refer to our main Data Protection Policy.

Name of policy Surveillance Policy	Policy reviewed September 2021 (V2) November 2022 (V3) November 2023 (V4) November 2024 (V5) February 2025 (V6) March 2026 (V7)
Original policy date September 2020	Current version V7
Date of new review March 2027	

Appendix A - CCTV System Checklist

School Name:

Name and Description of Surveillance System:		
The purpose and requirements of the system are addressed by the system (i.e. the cameras record the required information).	YES	NO
	Notes:	
The system is still fit for purpose and produces clear images of adequate resolution.	YES	NO
	Notes:	
Cameras are sited in effective positions to fulfil their task.	YES	NO
	Notes:	
Cameras are positioned so that they avoid capturing the images of persons not visiting the premises and/or neighbouring properties.	YES	NO
	Notes:	
There are visible signs showing that CCTV is in operation. These signs include: <ul style="list-style-type: none"> ▪ Who operates the CCTV, ▪ Their contact details, 	YES	NO
	Notes:	

<ul style="list-style-type: none"> What the purpose of the CCTV is. 		
<p>CCTV recordings are securely stored and access limited.</p>	YES	NO
	Notes:	
<p>The system has the capability to transfer recordings to law enforcement or to fulfil a request for an individual's own personal information.</p>	YES	NO
	Notes:	
<p>The system has a set retention period. This retention period should only be long enough to fulfil the CCTV's purpose and not longer. Outside of this retention period information should be deleted.</p>	YES	NO
	Notes:	
<p>The system users should be able to selectively delete information still inside the retention period to fulfil the right to erasure.</p>	YES	NO
	Notes:	
<p>All operators have been authorised by the Information Asset Owner and have sat their mandatory data protection training.</p>	YES	NO
	Notes:	

<p>The system has been added to the school/MAT's central record of surveillance systems. (This is particularly relevant if there are multiple systems, or they are spread across multiple sites).</p>	YES	NO
	Notes:	

<p>Checklist completed by:</p> <p>Name: Job Title: Date:</p>	<p>Checklist reviewed and signed by (Information Asset Owner):</p> <p>Name: Job Title: Date:</p>
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