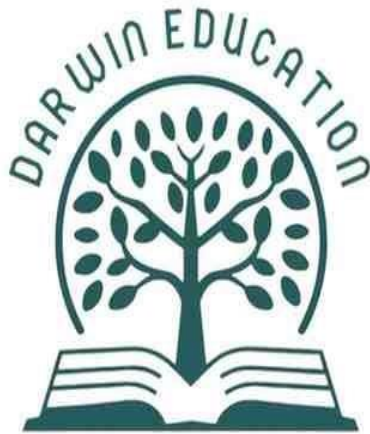




Darwin Education (CCTV) Policy

This policy sets out the approach of Darwin Education to the operation, management, and use of Closed-Circuit Television (CCTV) systems.

CCTV is used as part of the organisation's wider safeguarding, behaviour management, and site security arrangements. The system is operated in a way that is lawful, proportionate, and respectful of individuals' privacy in accordance with UK data protection legislation.

INTRODUCTION

This policy sets out the approach of Darwin Education to the operation, management, and use of Closed-Circuit Television (CCTV) systems.

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1. Aims

1.1 Statement of intent

The purpose of the CCTV system is to:

- Promote a safe and secure environment for students, staff, and visitors
- Protect individuals from harm or risk
- Deter and prevent criminal behaviour and anti-social conduct
- Protect buildings, equipment, and organisational assets
- Support safeguarding and behaviour management processes
- Assist in investigating incidents, complaints, or accidents
- Provide evidence for investigating incidents and, where appropriate, disciplinary procedures in line with safeguarding and organisational policies
- Support law enforcement agencies where appropriate

The CCTV system will not be used to:

- Unreasonably intrude on an individual's privacy
- Monitor areas where there is an expectation of privacy (e.g. toilets, changing areas)
- Target or track individuals without clear justification
- Be used for commercial or marketing purposes

All use of CCTV will be **necessary, proportionate, and justified**.

2. Legislation and guidance

2.1 Legislation

This policy complies with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Human Rights Act 1998
- Protection of Freedoms Act 2012
- Regulation of Investigatory Powers Act 2000
- Equality Act 2010
- Freedom of Information Act 2000
- Children Act 1989 and 2004
- Darwin Education is registered with the Information Commissioner's Office (ICO) and pays the required data protection fee.

2.2 Guidance

- Information Commissioner's Office (ICO) CCTV Code of Practice
- Darwin Education is registered with the Information Commissioner's Office (ICO) and pays the required data protection fee.
- Surveillance Camera Code of Practice

2.3 Lawful Basis

The lawful basis for processing CCTV data is:

- Legitimate interests
- Safeguarding obligations

3. Definitions

- **CCTV:** A system of cameras used to record and monitor activity
- **Personal data:** Any recorded image where an individual can be identified
- **Processing:** The recording, storage, retrieval, viewing, sharing, or deletion of footage
- **Covert surveillance:** Monitoring carried out without individuals being aware

4. Covert surveillance

Darwin Education does not routinely use covert surveillance.

It may only be considered where:

- There is suspicion of serious criminal activity
- It is necessary to prevent harm or protect individuals
- Law enforcement advice has been obtained

Before any covert surveillance is authorised:

- A **Data Protection Impact Assessment (DPIA)** will be completed
- Approval will be obtained from senior leadership
- The use will be strictly time-limited and reviewed

5. Location of cameras

Cameras are positioned to meet the aims of this policy and are located in:

- Hallways
- Entrances and exits

Cameras are **not installed** in:

- Toilets
- Changing areas
- Staff welfare or private spaces

Additional controls:

- Cameras are not directed at neighbouring private property
- Placement minimises intrusion while maintaining safety
- Clear signage is displayed informing individuals that CCTV is in operation. Signage is located on entrance to the property

6. Roles and responsibilities

6.1 Senior Leadership Team

Responsible for:

- Overall oversight of CCTV use
- Approving installation or changes to the system

6.2 IT department

Responsible for:

- Day-to-day management of the CCTV system
- Authorising access to footage
- Managing external requests for footage
- Ensuring staff follow this policy
- Ensuring system security and updates
- Managing storage and technical functionality

6.3 Data Protection Officer (DPO)

Responsible for:

- Monitoring compliance with UK GDPR
- Handling subject access requests (SARs)
- Conducting and advising on DPIAs
- Training staff in data protection
- Acting as a contact point for the ICO
- Ensuring data is handled lawfully and securely
- The Data Protection Officer (DPO) can be contacted by emailing darwineducations@gmail.com

7. Operation of the CCTV system

- The system operates **24 hours a day, 365 days a year**
- CCTV records **video only (no audio)**
- All footage includes accurate **date and time stamps**
- System functionality is checked regularly

8. Storage of CCTV footage

- Footage is stored securely on protected systems
- Retention period is **up to 30 days**
- Footage may be retained longer where required for investigation
- Exported footage is secured and, where possible, encrypted

9. Access to CCTV footage

Access is:

- Restricted to authorised personnel only
- Granted on a **need-to-know basis**
- Logged where possible

9.2 Subject Access Requests (SARs)

Individuals have the right to request access to footage of themselves.

The organisation will:

- Respond within **1 calendar month**

- Require sufficient information to locate footage
- Verify identity before releasing data

Where other individuals appear in footage:

- Images will be blurred or redacted where possible
- Consent may be sought if necessary

Requests may be refused where lawful (e.g. ongoing investigations).

9.3 Third-party access

Footage may be shared with:

- Police
- Safeguarding agencies

Conditions:

- Requests must be lawful and necessary
- Requests should be made in writing
- All disclosures are recorded

10. Data Protection Impact Assessment (DPIA)

Darwin Education follows the principle of **privacy by design**.

A DPIA will be conducted when:

- Installing new cameras
- Changing camera locations
- Upgrading or expanding the system

This ensures CCTV use remains:

- Necessary
- Proportionate
- Justified

11. Security

Security measures include:

- Password-protected systems
- Restricted access permissions
- Secure storage of footage
- Regular system maintenance and checks
- Timely application of software updates
- Protection against unauthorised access or cyber threats

12. Complaints

Complaints regarding CCTV use should be made via the organisation's complaints procedure.

If unresolved, individuals may contact the Information Commissioner's Office (ICO).

13. Monitoring

This policy is reviewed annually to ensure:

- Continued need for CCTV
- Compliance with legislation
- Effectiveness of the system

14. Links with other policies

This policy should be read alongside:

- Data Protection Policy
- Child Protection Policy
- GDPR Policy
- Staff Code of Conduct
- Complaints Policy

Policy Details

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