

SP22 CCTV SURVILLANCE POLICY

Policy Number	SP22
Policy Name	CCTV Surveillance Policy
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Owner	IT Manager
Reviewing Body	Approved by Executive Team, ratification by Board of Trustees

Version	Amendments	Date	Initials	Publish on Website?
0.0	Original	September 2020	MT	
1.1	2 year review	September 2022	MT/BOT	Yes
1.2	2 year review	September 2024	DL/BOT	

1.0 Introduction

This policy regulates the management, operation and use of the closed circuit television (CCTV) used at Portfield School and other Autism Unlimited properties.

Autism Unlimited takes seriously its moral and legal responsibility to protect, promote and safeguard the welfare of all students and PWS in its care, as well as the staff, who reside in all of our properties.

The use of CCTV is an essential part of the solution to achieve this objective because it provides 24-hour surveillance, both internally and externally at a number of our properties ([see Appendix A](#)). The cameras located within Portfield School and on campus are monitored within the school.

This policy aligns with the **UK General Data Protection Regulation (UK GDPR)** and the **Surveillance Camera Code of Practice (2021)** to ensure that the processing of personal data through CCTV remains lawful, fair, and transparent."

- data must be processed fairly, lawfully and in a transparent manner;
- processed for limited purposes and not further processed in any manner incompatible with those purposes;
- adequate, relevant and not excessive in relation to the purpose(s);
- accurate;
- not kept for longer than is necessary;
- processed in accordance with individuals' rights;
- is secure

This policy seeks to promote an individual's rights and respect their dignity in line with GDPR guidelines. This policy is compliant with the Government Guidance: Surveillance and monitoring in residential childcare settings October 2019.

1.1 The charity role for ensuring implementation of this policy is the Head of IT.

2.0 Purpose

2.1 We use CCTV in order to protect the safety of all students and staff by:

- Maintaining a safe and secure environment
- Monitoring and protecting the school buildings and assets

- Ensuring the welfare of students, staff and visitors
- Deter criminal acts against persons and property
- Deter violent behaviour and damage to the school
- Assist the police in identifying persons who have committed an offence

Materials or knowledge secured as a result of CCTV are not used for any commercial purpose. Video is only released to external agencies for use in the investigation of specific crime and with the written authority of the Police.

Signage is in place to inform individuals that they are in an area where CCTV is used.

3.0 CCTV Surveillance

"In accordance with the Surveillance Camera Code of Practice (2021), Autism Unlimited will ensure that the use of CCTV is proportionate and justified, considering privacy impacts and alternative methods."

Before installing CCTV, Autism Unlimited will consider whether it is lawful, justified, necessary and proportionate. The charity will also consider whether a less privacy intrusive method could be used, whether there is a better solution and the impact on individuals. The charity will regularly evaluate whether it is necessary and proportionate to continue using the CCTV. The surveillance system will be registered with the ICO in line with data protection legislation and will use the Checklist within the Code of Practice for Surveillance Cameras and Personal Information before introducing the surveillance systems.

Retention of CCTV Footage

"CCTV footage will be retained for no longer than necessary, typically not exceeding 30 days, unless required for an investigation or legal proceedings. Data will be securely deleted in line with the charity's data retention policies and the ICO's CCTV Code of Practice."

"Individuals have the right to request access to CCTV footage that contains their personal data. Autism Unlimited will respond to such requests within one calendar month, in accordance with the UK GDPR."

3.1 Portfield School

There are a total of sixteen cameras installed both externally and inside the school building. Ten are located externally within the campus grounds, car park and front gate. The six cameras installed within the school monitor the two reception areas and the corridors.

3.2 Residential Services

Two cameras are located inside the bedroom of a PWS at Greenways property.

The main purpose of this CCTV is to monitor seizure activity whilst the PWS is alone in the bedroom. The parents can remotely view the CCTV footage via a TeamViewer connection to a desktop PC at the property where the software is installed.

The staff are able to disable the parents' remote access at any time and there is no audio being recorded.

3.3 Airfield Road

The CCTV system is owned and maintained by New Forest Classic Cars with a total of seven external cameras installed at the property. CCTV cameras are now installed in areas including the playground, with the purpose of ensuring the safety and security of all individuals on the premises. The cameras will

not be used to monitor students' day-to-day activities unless there is a security-related incident. Access to recorded footage is restricted to authorized personnel only, and footage will be stored in compliance with relevant data protection laws.

In the event there was an incident that needed further investigation from the recorded images, the IT Manager would contact the General Manager of New Forest Classic Cars to request system access.

"Any incidents or security breaches involving CCTV footage, including unauthorised access or data breaches, must be reported to the Data Protection Officer (DPO) immediately, ensuring compliance with the UK GDPR and Surveillance Camera Code of Practice (2021)."

4.0 Data Protection and Digital Information Bill

"Autism Unlimited will continuously monitor changes in data protection laws, including the Data Protection and Digital Information Bill, to ensure ongoing compliance with surveillance and data handling requirements."

5.0 Linked policies

This policy operates in conjunction with the following school policies:

- [Positive Behaviour Policy](#)
- Staff Code of Conduct (this is found in the staff handbook)
- [Data Protection Policy - GDPR](#)
- [Child Protection and Safeguarding Policy](#)

Appendix A

Location	Internal / External	Number of Cameras	Where	Owner	Equipment	Maintenance & Support
Parley Campus	External	10	Monitoring the front gate and campus grounds	Autism Unlimited	HikVishion DS-7316HUHI-K4 3 x BNC cameras 7 x IP digital cameras 1 x dedicated server	Automated Systems
Portfield School	Internal	6	Monitoring main reception, pool reception and corridors	Autism Unlimited	HikVishion DS-7316HUHI-K4 6 x IP digital cameras	Automated Systems

Airfield Road	External	7	Monitoring the grounds to the front and rear of the building	Landlord New Forest Classic Cars daniel.s@newforestclassiccars.com	Q-VIS 7 x IP digital cameras 1 x dedicated server (on-site) <i>System access via Daniel if required</i>	Southern Central Security
Greenways	Internal	2	Monitoring PWS in bedroom. Video accessible by staff and parents remotely	Parents	Blue Iris 2 x IP digital cameras Desktop PC	Parents/Internal IT team