



R.E.A.L. Education Limited

CCTV Policy

**(R.E.A.L. Education Ltd.)
(R.E.A.L. Independent Schools, Hinckley)
(R.E.A.L. Independent Schools, Mansfield)**

Last Reviewed: 15/10/2024



1. Introduction

R.E.A.L. Education and R.E.A.L Independent Schools, hereafter known as R.E.A.L. use closed-circuit television (CCTV) in order to protect the safety of learners, staff, parents/carers and visitors, as well as ensure the security for our venues.

This policy outlines how R.E.A.L. uses CCTV in line with the principles set out within the Surveillance Camera Code of Practice 2021. All personal data obtained is stored in accordance with UK General Data Protection Regulations (UKGDPR) and Data Protection Act 2018.

2. Purpose

The CCTV recordings may be used for:

- prevention and detection of crimes, in R.E.A.L. and on the premises
- learner behaviour management
- staff disciplinary and associated processes
- maintaining a safe environment for the whole of the R.E.A.L. community

3. CCTV system operation

The CCTV system will be operational 24 hours a day, 365 days a year. The R.E.A.L. is registered with the Information Commissioner's Office (reg no: Z3076172)

The CCTV system does not record audio and any Ring doorbell systems used on sites are live stream only, no data is stored. All CCTV recordings will have an accurate date and time stamp.

4. Location of cameras

The cameras are located in places that require monitoring in order to achieve the purpose of the CCTV system. No camera focuses, or will focus, on toilets, shower facilities and/or changing rooms. All cameras are also clearly visible.

Appropriate signs are displayed around R.E.A.L. premises within prominent locations that clearly identifies that CCTV recording is in operation.

5. General access to CCTV footage

It will not be common practice to release CCTV footage unless satisfactory evidence for a secure legal basis can be provided. This is authorised within Section 115, Crime and Disorder Act 1998.



In appropriate circumstances, R.E.A.L. may allow authorised personnel to view footage where the above purposes are considered.

R.E.A.L. will maintain a record of all disclosures outside of R.E.A.L.

All requests for access should be made in writing to the Head of Health, Safety and Environments and be specific to a date and time frame.

Any disclosure will be done in line with UK GDPR and Data Protection.

R.E.A.L. cannot guarantee disclosure of footage when made under a Subject Access Request due to:

- lack of technical resources available in order to blur or redact the footage
- the release of footage would prejudice an ongoing investigation
- other identifiable individuals have not consented

6. Authorised CCTV system operators

R.E.A.L. has limited staff members, who are fully trained and understand the importance of confidentiality, who are authorised to access and operate the CCTV system.

The authorised personnel within R.E.A.L. are:

- Head of Health, Safety and Environments
- Property Maintenance Coordinator

Viewing of the CCTV data will only be permitted in authorised circumstances for purposes listed in section 2.

7. Storage of footage

Footage will be retained for no longer than necessary to achieve the purposes of the system.

The retention period is detailed in Appendix 1 below. At the end of the retention period, the files will no longer be available for viewing.

On occasion footage may be retained for longer than the retention period. For example, where a law enforcement body is investigating a crime.



Recordings will be downloaded and encrypted, so that the data will be secure, and its integrity maintained, to ensure it can be used as evidence if required.

All recordings must be logged and traceable throughout their life within the system.

8. CCTV system security

A full Data Privacy Impact Assessment will be completed upon deployment, replacements, development or upgrading of the CCTV system. This is in line with the UK GDPR principle, Privacy by Design, and ensures the aim of the system is reasonable, necessary and proportionate.

The system will be made secure by the following safeguards:

- the Head of Health, Safety and Environments will be responsible for overseeing the security of the footage and recorded images, maintenance and training of authorised personnel
- the system will be checked for faults in line with manufacturers guidelines
- the footage will be stored securely and encrypted
- the software updates will be installed as soon as possible
- the recorded footage will be password protected
- the equipment will be located in a secure location within the building
- adequate cyber security measures will be in place to protect footage from cyber-attacks
- a register of authorised staff is maintained, reviewed and updated when necessary

9. Use of dash cams in staff vehicles

Personal vehicles may be used by staff members to transport Learners and/or R.E.A.L. staff. Where staff members have a dash cam installed in their vehicles this is only for the purpose of potential insurance claims.

R.E.A.L. will ensure that:

- at the point of induction it will be established by the Data Protection Officer (DPO) if the member of staff has a dash cam installed in their work vehicle. It is the responsibility of the staff member to inform HR if this changes at any point during their employment
- staff will be responsible for keeping any recorded data secure and aware they may need to provide the data if requested as part of a Subject Access Request



- staff will be responsible for displaying the provided sign in their vehicle, informing learners and/or R.E.A.L. staff that recording is taking place
- staff will alert the DPO if they need to use any dash cam footage for the purpose of an insurance claim, if the data contains learners and/or R.E.A.L.

10. Covert recording

R.E.A.L. will only 'covert record' when the following criteria are met:

- an assessment concluded that if we had to inform individuals that recording was taking place it would prejudice our objective
- there is reasonable cause to suspect specific criminal activity or actions that could result in a serious breach of staff or volunteer behaviour expectations is taking place
- covert processing is carried out for limited and reasonable period of time and related to specific suspected criminal activity
- if the situation arises where R.E.A.L. adopts 'covert recording', there will be a clear documented procedure which sets out how the decision to record covertly was reached, by whom and the risk of intrusion on individuals

11. Complaints

Any complaints should be made in writing to the Data Protection Officer (DPO):

- Unit 1 Kingsmill Way, Mansfield, Nottinghamshire, NG18 5ER
- Email address: GDPR@real-education.org

12. Review and monitoring

Appropriate changes to this policy will be made accordingly in line with changes to legislation.

Communication regarding changes to authorised staff members will be made via either the DPO, Head of Health, Safety and Environments or the Directors.



Appendix 1 - Location of cameras, signs and retention

School Site Venues	Internal Cameras	External Cameras	No. days recording kept	Who can access the system
RIS Mansfield (Woodhouse Road)	Yes	Yes	28 - Hik Vision	Head of Health, Safety and Environments and Property Maintenance Coordinator
RIS Mansfield (Underwood)	Yes	Yes	28 - Hik Vision	Head of Health, Safety and Environments and Property Maintenance Coordinator
RIS Mansfield (Blidworth)	No	No	na	No CCTV system currently onsite
RIS Mansfield (Concorde House)	No	Yes	28 - Hik Vision	Head of Health, Safety and Environments and Property Maintenance Coordinator
RIS Mansfield (Delta House)	No	Yes	28 - Hik Vision	Head of Health, Safety and Environments and Property Maintenance Coordinator
RIS Mansfield (The Gallows)	No	Yes	28 - Hik Vision	Head of Health, Safety and Environments and Property Maintenance Coordinator
RIS Hinckley (Hinckley)	No	Yes	28 - Hik Vision	Head of Health, Safety and Environments and Property Maintenance Coordinator <i>Note: Live footage of all cameras can be seen</i>
RIS Hinckley (Nanpantan)	No	No	na	No CCTV system currently onsite
Square One (Nottingham Rd)	No	No	na	No CCTV system currently onsite
City Hub (Newark Street)	Yes	Yes	28 - Hik Vision	Head of Health, Safety and Environments and Property Maintenance Coordinator
Sandhills (Worksop)	No	Yes	28 - Hik Vision	Head of Health, Safety and Environments and Property Maintenance Coordinator.
Head Office & KMW (Unit 1/2 Kings Mill Way)	Yes	Yes	30 - Vault	Head of Health, Safety and Environments and Property Maintenance Coordinator. <i>Note: Live footage of all cameras can be seen</i>
Creative Digital (Acorn Business Park)	Yes	Yes	28 - Hik Vision	Head of Health, Safety and Environments and Property Maintenance Coordinator.



Landbased Studies (Pinxton)	No	No		No CCTV system currently onsite
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Rented Venues: Any buildings that are rented and/or licenced venues for R.E.A.L Education on a long term basis, R.E.A.L. will ensure a CCTV policy and adequate security is in place to safeguard the data.