



St. Cuthbert's
Roman Catholic High School

WHOLE SCHOOL POLICY & PROCEDURES

CCTV POLICY



Mission Statement

*'The Lord God requires of us that we should help others whenever we can,
always make the right choices and be the best that we can be in everything that we do'.*

| | | |
|----------------------|-------------------------|-------------------|
| Policy: CCTV | | |
| Type: School Policy | Website: Yes | Author: A Jackson |
| Approved: March 2023 | Next Review: March 2025 | |
| Frequency: 2 Years | Delegated: Governors | |
| Notes: | | |

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1 Policy Statement

- 1.1 This policy provides guidance on the deployment and use of CCTV in St Cuthbert's RC High School, the roles and responsibilities of staff and the operation of the system.

2 Uses of CCTV

- 2.1 CCTV is used in the School to:
 - Assist in protecting the health and safety of students, staff and visitors.
 - To assist the school in safeguarding and pastoral care matters.
 - Monitor the security of the premises and the property of the School, its students, staff and visitors.
 - Detect and investigate disciplinary offences which are described in the School's disciplinary procedures
 - Identify individuals who breach School policies
 - Assist in the management of the School premises
- 2.2 The CCTV system may also be used to investigate complaints and to assist in civil/legal proceedings.
- 2.3 The School will not always be monitoring the CCTV system all of the time, classroom CCTV cameras can only be used to view recorded footage.
- 2.4 The system will only be used in a manner which is fair to everyone.

3 Legislation

- 3.1 The company is registered with the Information Commissioners' Office as a controller. Also, the use of CCTV and its associated images are in line with UK GDPR, DPA 2018, Human Rights Act 1998 and the CCTV Code of Practice published at - <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>.

4 Roles and Responsibilities

4.1 IT Manager

The IT Manager is responsible for:

- The installation and operation of the CCTV system in a manner which complies with the CCTV Code of Practice issued by the Office of the Information Commissioner.
- The setup and views of the cameras.
- Setting user access permissions to the system.
- The security of the CCTV system.
- Showing classroom footage after receiving approval from nominated staff for the request made.
- Providing statistics to interested parties with regards to the use of the CCTV system.

4.2 Site Manager

The Site Manager has responsibility for:

- Installation of the CCTV signs.
- Monitoring of the CCTV system and where necessary log calls via the internal helpdesk to ICT support.

4.3 Staff with access to recorded images

All staff with access to recorded images:

- Should be aware of the procedures which must be followed when accessing the recorded images.
- Should be aware of their responsibilities under the CCTV Code of Practice issued by the Office of the Information Commissioner and be aware of and comply with this CCTV Policy.
- Must ensure that access to, and disclosure of, the images recorded by CCTV is made in accordance with this policy.

5 Operational Policy

- 5.1 The system records in a continuous manner from each CCTV camera to hard disk. Unless stored separately, the oldest data will be overwritten by new recordings after a period of 7 days.

- 5.2 Live viewing of the system or reviewing of recorded material prior to the production of specific recordings under paragraph 5.3, by authorised staff of the School and others, including the Police, will be permitted at all reasonable times. In these circumstances it will not be possible to obscure the identity of persons not relevant to any investigation. Classroom CCTV cameras do not have a live view capacity.

Approved staff must consider the implications of allowing victims/complainants to view material in

this form. Care must be taken to ensure that evidence is not compromised if potential witnesses are to view material.

- 5.3 On request from either the Headteacher or Deputy headteacher, the IT Manager will save images to a separate medium and will ensure that they have documented:
 - The date on which the images were copied from the system, the name of the person copying them from the system, at whose request they were copied from the system, the filename and location of the copied images. (all requests to be submitted via e-mail to the IT Manager, email must have come from SLT). Footage will be encrypted and the password sent via secure email to the requestor. If appropriate, the signature of the collecting Police Officer or other agent where relevant.
- 5.4 After 31 days, unless it is required as evidence in Police or internal disciplinary or civil proceedings, the requestor of the footage will ensure that the footage is destroyed. If the footage is passed onto a 3rd party then the destruction of the footage when no longer required is passed onto the requestor.
- 5.5 The School may release recordings to the Police or other authorised persons for the purposes of the prevention or detection of crime, the apprehension or prosecution of offenders, or in other circumstances where the School is legally obliged to do so, in accordance with the specified purposes of the CCTV system. The School will form a judgement as to whether releasing recordings which contain images of individuals not relevant to any investigation or request for access may be prejudicial to those individuals and act accordingly.

The identity of individuals on the recording whose presence is relevant to the investigation or request for access will be disclosed if they give consent for this and may be disclosed if this consent is refused when deemed reasonable to do so in the circumstances.

- 5.6 The reason for disclosing copies of the images must be compatible with the reason or purpose for which they were originally obtained.

6 Requests from Data Subjects and Others for Access

- 6.1 Any individual whose personal data is held by the School in the form of a CCTV recording can request access to that recording and the School will respond in accordance with the Data Protection Act 2018/UK General Data Protection Regulation.
- 6.2 Recordings will be released for reviewing to other persons, i.e. not the individual whose personal data it is, in accordance with the UK General Data Protection Regulation on the authority of a member of the School Leadership Team who must be satisfied of the need to release them unless ordered to do so under statutory powers. School will respond to requests within 1 month of receiving the written or verbal request.
- 6.3 The Head teacher/Leadership Team will decide whether to allow request for access by third parties in accordance with School disclosure policies.

- 6.4 School reserves the right to refuse access to CCTV footage where this would prejudice the legal rights and freedoms of other individuals or jeopardise an on-going investigation.
- 6.5 All requests for access or disclosure should be recorded. If access or disclosure is denied, the reason should be documented.
- 6.6 Viewing of the recorded images should take place in a restricted area, for example, in a manager's or designated member of staff's office. Other employees, students and members of the public should not be allowed to have access to that area when a viewing is taking place.
- 6.7 Removal of the medium on which images are recorded, or the transfer of images to a portable electronic device for viewing purposes, should be documented as follows:
- The date and time of removal.
 - The name of the person removing the images.
 - The name(s) of the person(s) viewing the images. If this should include third parties, this should include the organisation of that third party.
 - The reason for the viewing.
 - The outcome, if any, of the viewing.
 - The date and time the images were returned to the system or secure place, if they have been retained for evidential purposes.
- 6.8. There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).
- 6.9. Requests for images / data should be made in writing to the Headteacher/ IT Manager.
- 6.10. The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

7 Signage

- 7.1 Signs will be placed so that staff, students and the public are aware that they are entering a zone which is covered by surveillance equipment. The signs should be clearly visible and legible.
- 7.2 The signs will contain the following information:
- St Cuthbert's RC School as the organisation responsible for the scheme.
 - The purposes of the scheme.
 - Details of whom to contact regarding the scheme.
 - St. Cuthbert's site team will be responsible for the installation of CCTV signage and the replacement of any damaged or missing signage.
 - Smaller signs will be placed on the door of any classroom or staff area where CCTV recording is taking place.

8 Security

- 8.1 Monitors displaying images from areas in which individuals would have an expectation of privacy should not be viewed by anyone other than authorised employees. This security is extended to any mobile devices which also have access to the School CCTV system, this includes being mindful that the device should not be operated by anyone other than the asset guardian of the device.
- 8.2 Access to the recorded images will be restricted to designated staff who need to have access in order to achieve the purpose of using the equipment.
- 8.3 All School employees with access to CCTV images will be aware of the restrictions set out in this policy in relation to access to, and disclosure of, recorded images.
- 8.4 Disclosure of the recorded images to third parties should only be made in limited and prescribed circumstances and with the consent of the IT Manager acting in the Head teacher's discretion.
- 8.5 If access to or disclosure of the images is allowed, then the following should be documented:
 - The date and time at which access was allowed or the date on which disclosure was made.
 - The identification of any third party who was allowed access or to whom disclosure was made.
 - The reason for allowing access or disclosure.
 - The extent of the information to which access was allowed or which was disclosed.
- 8.6 Recorded images should not be made more widely available – for example they should not be routinely made available to the media or placed on the Internet.
- 8.7 If it is intended that images will be made more widely available, that decision will be made by the Head teacher/Leadership Team. The reason for that decision should be documented.
- 8.8 If it is decided that images will be disclosed to the media (other than in the circumstances outlined above,) the images of individuals not relevant to the disclosure must not be readily identifiable, or their permission for the disclosure must be sought.

9 Installation & Maintenance

- 9.1 The system will be subject to annual maintenance and repairs. Equipment and recordings may be only be viewed by personnel authorised to undertake installation and maintenance of the CCTV systems.
- 9.2 Viewing during maintenance will be restricted to that necessary for system work.

10. Further Information

Further information on CCTV and its use is available from the following:

In the picture: A data protection code of practice for surveillance cameras and personal information (published by the Information Commissioners Office) Version 1.2 - <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

Surveillance Camera Commissioners Code of Practice 28 October 2014
<https://www.gov.uk/government/publications/surveillance-camera-code-of-practice>

Data Protection Act 2018
UK GDPR (25 May 2016)

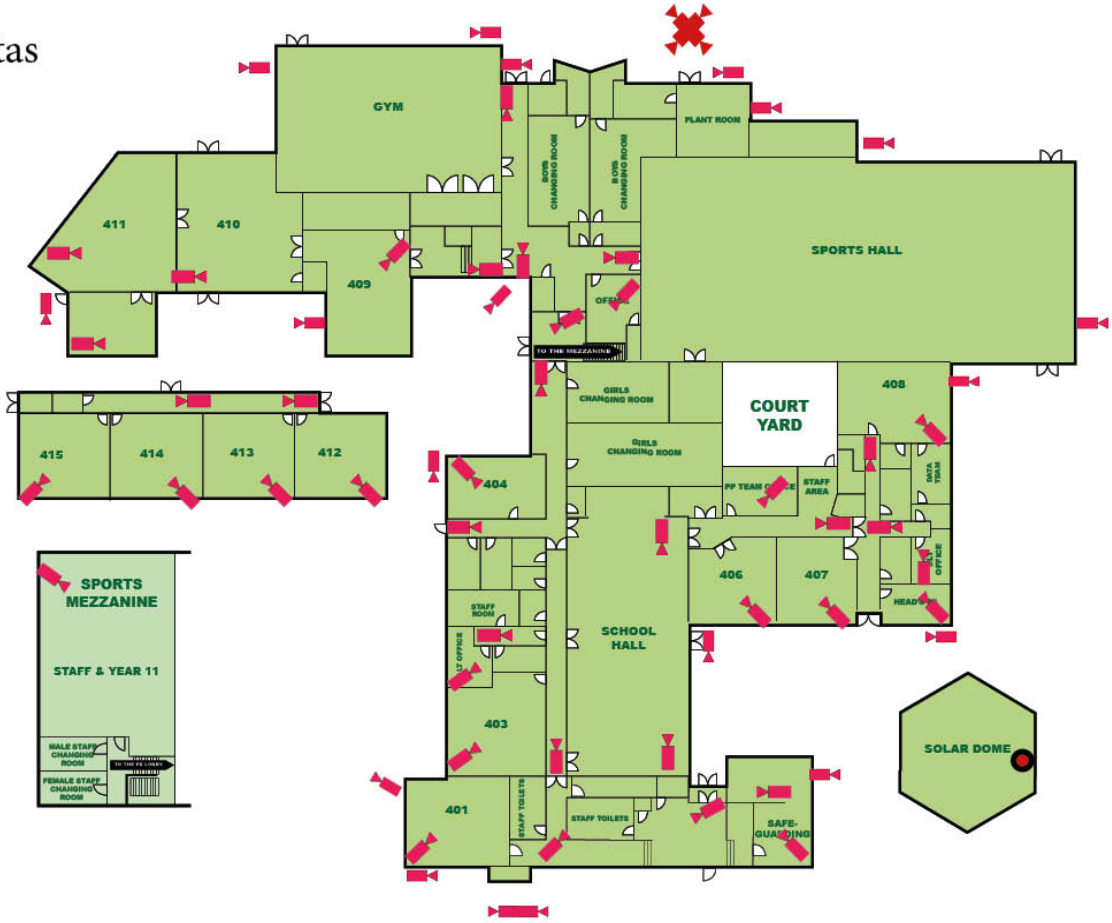
11 Monitoring and Evaluation

11.1 Responsibility for monitoring and evaluation of the policy lies with the School Leadership Team.

All complaints should be directed to the school via the DPO dpo@scrchs.com or Headteacher headteacher@scrchs.com, if you are not satisfied with the resolution then you can complain directly to the Information Commissioners Office at www.ico.org.uk

Location of CCTV Cameras

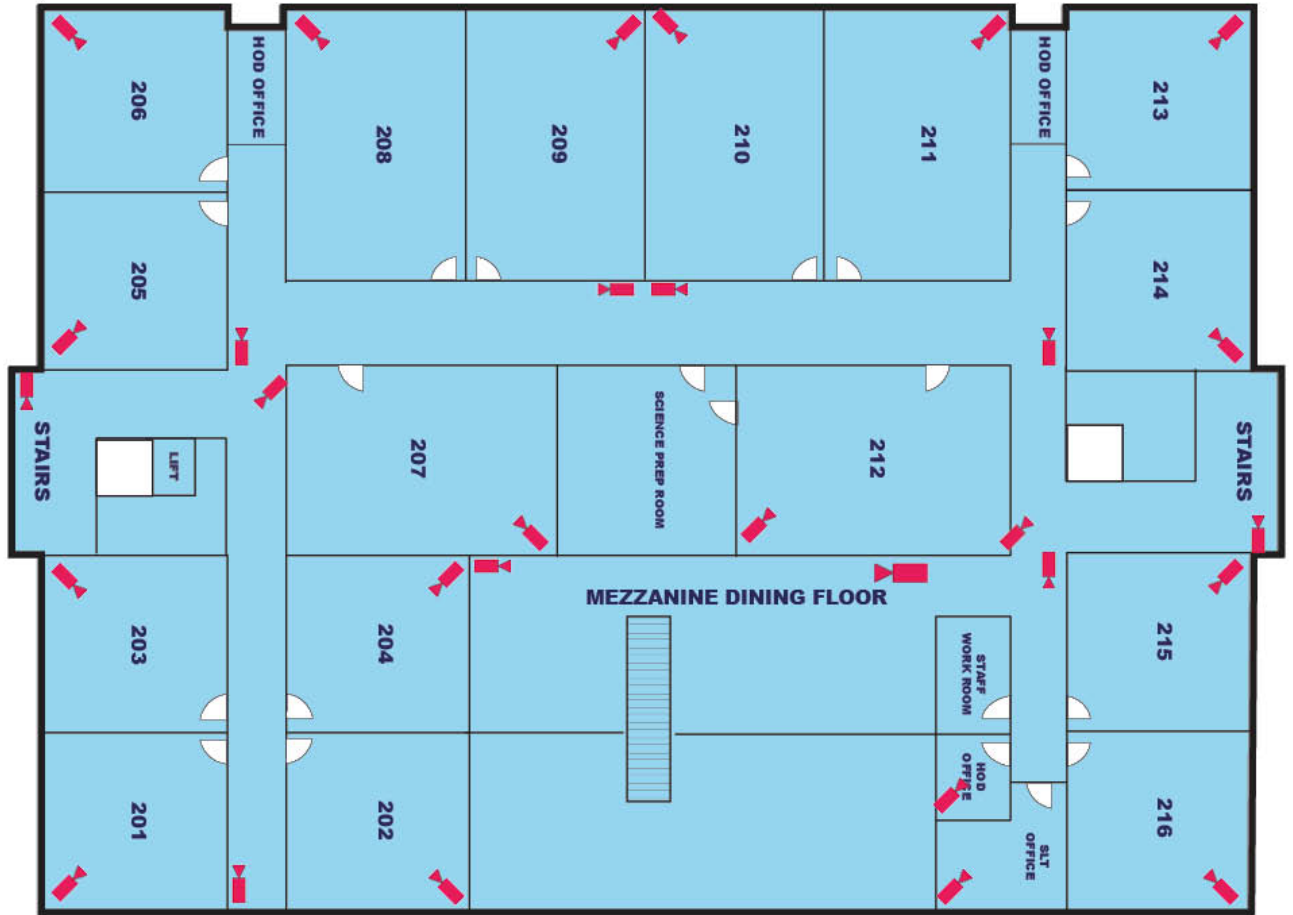
Caritas



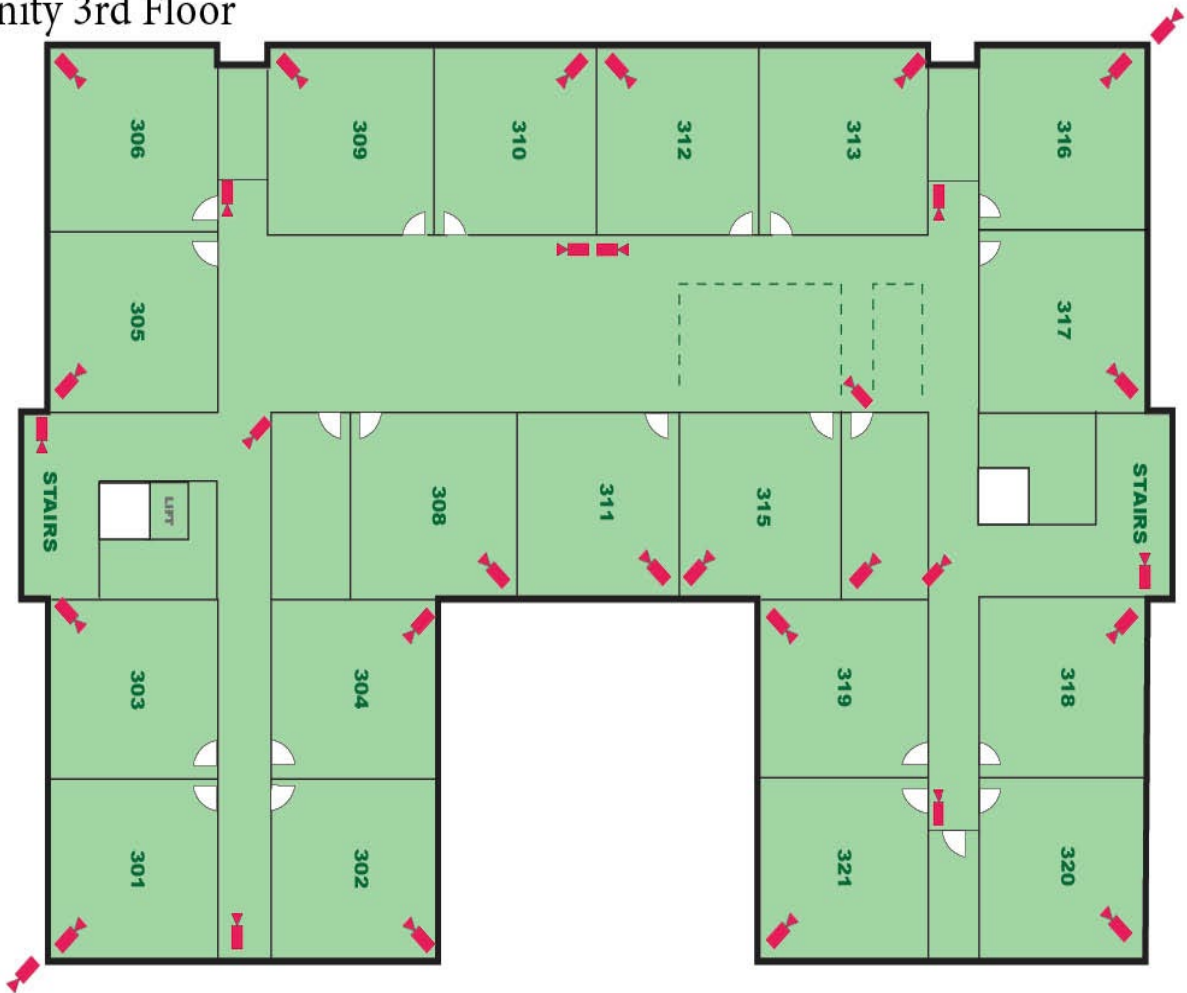
Trinity 1st Floor



Trinity 2nd Floor



Trinity 3rd Floor



Annex A – Checklist

This CCTV system and the images produced by it are controlled by the IT Manager who is responsible for how the system is used under direction from the company’s Data Protection Officer. The company notifies the Information Commissioner about the CCTV system, including any modifications of use and/or its purpose (which is a legal requirement of the current Data Protection Act 2018).

St Cuthbert’s Roman Catholic High School has considered the need for using CCTV and have decided it is required for the areas stated in para 2.1. It will not be used for other purposes. School will conduct regular reviews of our use of CCTV.

| | Checked (Date if appropriate) | By | Date of next review |
|---|--|-----------|--------------------------------|
| Notification has been submitted to the Information Commissioner and the next renewal date recorded. | | | |
| There is a named individual who is responsible for the operation of the system. | Yes | | |
| A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required | Yes | | |
| Staff will be consulted about any proposal to install / amend CCTV equipment or its use as appropriate. | Yes | | |
| Cameras have been sited so that they provide clear images. | Yes | | |
| Cameras have been positioned to avoid capturing the images of persons not visiting the premises. | Yes | | |
| There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s). | Yes | | |
| Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them. | Yes | | |

| | | | |
|---|------------------------|--|--|
| The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated. | Yes | | |
| Except for law enforcement bodies, images will not be provided to third parties. | Yes | | |
| The company knows how to respond to individuals making requests for copies of their own images. If unsure the data controller knows to seek advice from the Information Commissioner as soon as such a request is made. | Yes | | |
| Regular checks are carried out to ensure that the system is working properly and produces high quality images. | Yes. (Daily checks) | | |

Annex B

Data Subject Access Request – Consent Form

For the purposes of this request Greater Manchester Police are the third party and we would asked with the data subject consents to the disclosure of data from the St Cuthbert’s Roman Catholic High School in accordance with Police Form 0819B in that any special or personal data requested is supplied to the third party as soon as possible.

| Data Subject’s Information | |
|---|-----------------------|
| Name of the Data Subject | |
| Date of Birth | |
| Address where Data Subject attended school | |
| Third Party Information | |
| Name of the person requesting information on behalf of the Data Subject | |
| Address of the person requesting information on behalf of the Data Subject | |
| Personal Information Requested in relation to the Data Subject <i>Crime Reference Number for Request.</i> | |
| AUTHORISATION OF DATA SUBJECT | |
| I consent to the third party named in this consent form being provided with the special category or personal information specified in this form. <i>We require a signature to signify consent from the data subject to process their data and to ensure security measures relating that data</i> | Signed: Dated: |

| | |
|---|--|
| <p><i>are robust. Scanned copies will be accepted, provided the form is signed.</i></p> | |
|---|--|

If you have any further queries regarding this form do not hesitate to contact our Data Protection Officer via phone on 07845 803950.