

# **CCTV Policy**

## **Saint John Houghton Catholic Voluntary Academy**

### **Part of the Saint Ralph Sherwin Catholic Multi Academy Trust**



**St Ralph  
Sherwin**  
Catholic Multi Academy Trust

**Approved by: Headteacher**

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## 1. Introduction

Saint John Houghton Catholic Voluntary Academy is situated in Kirk Hallam, just outside Ilkeston in Derbyshire, at the heart of a housing estate. The site of the school is situated close to housing and also public footpaths so we have therefore looked at alternative ways of providing security for both our pupils and the public and to assist in the prevention of theft or damage to the school or its property.

The main legislation in this area is the Data Protection Act 2018, the General Data Protection Regulation (GDPR), the Human Rights Act 1998 as well as the Education (Independent School Standards) Regulations 2014. Other legislation not directly relevant to independent schools, but applicable to general principles, include the Regulation of Investigatory Powers Act 2000 and the Protection of Freedoms Act 2012.

We have notified the Information Commissioner's Office (ICO) that we operate a CCTV system.

## 2. Aims of this policy

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Saint John Houghton CVA (the School). It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the System).

The System is administered and managed by the School, who act as the Data Controller. This policy is reviewed regularly and should be read with reference to the School's Data Protection & Privacy Policy (available on our website). We conduct an annual audit and review of our use of CCTV using the checklist in Appendix 2 of the ICO's CCTV Code of Practice. This was last completed in October 2020. Records are kept by the Office Manager.

All fixed cameras are in plain sight on the School premises and the School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds.

The School's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the School believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

## 3. Objectives of the System

3.1 To protect the personal safety of pupils, staff, volunteers, visitors and members of the public.

3.2 To protect the School buildings and equipment, and personal property of pupils, staff, volunteers, visitors and members of the public.

3.3 To support the police and community in preventing and detecting crime and assist in the identification and apprehension of offenders.

3.4 To monitor the security and integrity of the School site and deliveries and arrivals.

3.5 To monitor staff and contractors when carrying out work duties.

3.6 To monitor and uphold discipline among pupils in line with the School's Behaviour Policy. The policy is available on the school website.

Anyone who accesses the System for any reason other than one of those stated is above is in breach of this policy and school procedures and is likely to face disciplinary procedures.

## 4 Positioning

4.1 Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.

4.2 Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.

4.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.

4.4 No images of public spaces will be captured except to a limited extent at site entrances.

We have 18 CCTV cameras, some of which are equipped with IR night vision, some are also vandal and weather resistant. We have one "live" monitor in our Reception that covers the School gates. We have 2 cameras in Room 5 and 2 in Room 6, both being ICT suites. We have 2 cameras in Room 11, which used to be an ICT suite. 4 cameras cover the Reception area, the "Student Entrance" and the school gates. The remaining 8 cameras are positioned outside various toilets across the site.

## 5. Maintenance

5.1 The CCTV System will be operational 24 hours a day, every day of the year.

5.2 The System Manager (defined below) will check and confirm that the System is recording and that cameras are functioning correctly, on a regular basis.

5.3 The System will be checked and (to the extent necessary) serviced regularly.

## 6. Supervision of the System

6.1 The Premises Manager is trained in operating, recording and retaining images taken. He is aware of the procedure for handling requests for the disclosure of an image by individuals, where the school's procedure is set out in our data protection policy. If in doubt, the Information Commissioner would be consulted.

6.2 Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

## 7. Storage of Data

7.1 The day-to-day management of images will be the responsibility of the Premises Manager, who acts as the System Manager, or such suitable person as the System Manager shall appoint in his absence.

7.2 Images will be stored for 30 days and automatically over-written unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.

7.3 Where such data is retained, it will be retained in accordance with the Act, our Data Protection & Privacy Policy and our Data Retention Policy. Information including the date, time and length of any recording if applicable, as well as the locations covered and groups or individuals recorded, will be recorded in a logbook.

## 8. Access to Images

8.1 Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

8.2 Individuals also have the right to access personal data the School holds on them (please see the Data Protection Policy & Privacy Notice on our website), including information held on the System, if it has been kept. The School will require specific details including at least the time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

8.3 The System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV images:

- Where required to do so by the Headteacher, the Safeguarding team, the Police or some relevant statutory authority;
- To make a report regarding suspected criminal behaviour;
- To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian will be informed as part of the School's management of a particular incident;
- To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 8.2 above;
- To the School's insurance company where required in order to pursue a claim for damage done to insured property; or

In any other circumstances required under law or regulation.

8.4 Where images are disclosed under 8.3 above a record will be made in the log book including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).

8.5 If images are provided to third parties under 8.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

The following staff have access to the CCTV: Premises Manager (System Manager) Headteacher, Deputy Headteacher, Assistant Headteacher (Student Support and Progress - Designated Safeguarding Lead), Assistant Headteacher (Behaviour and Attitudes), Behaviour Manager, ICT Manager, ICT Technician, Office Manager, Reception staff (restricted to the CCTV cameras at the main entry gate only).

## 9. Other CCTV systems

The School does not own or manage third party CCTV systems but may be provided with images of incidents where this is in line with the School's own CCTV policy and/or its Code of Conduct.

## 10. Complaints and queries

Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to Agnetha Perrin, Office Manager, Saint John Houghton Catholic Voluntary Academy, Abbot Road, Kirk Hallam, DE7 4HX. Telephone: 0115 932 2896.

## 11. Other Policies

This should be read in conjunction with our Data protection policy and privacy notice.