



# CHRIST THE KING CATHOLIC COLLEGIATE



A Multi Academy Company



## St Mary's Catholic Primary School Closed Circuit Television Policy

Date: 19/9/2024

Adopted:

Review: September 2026



### 1. Introduction

- 1.1 The purpose of this Policy is to regulate the management, operation and use of the Closed Circuit Television (CCTV) system at St Mary's Catholic Primary School, hereafter referred to as 'the School'.
- 1.2 The CCTV system is owned by the School.
- 1.3 The system comprises of external cameras located around the school premises. The monitor for external cameras and the system control centre are in the Premises staff office.
- 1.4 A CCTV camera is located in walk-ways, main entrances and exits and external areas including car parks, play grounds and vehicle entry and exit points.
- 1.5 All external cameras are monitored by Premises staff and images recorded direct to the CCTV camera control unit.
- 1.6 This Policy follows the Data Protection Act guidelines.
- 1.7 Operation of the School CCTV Policy will be reviewed annually by the Academy Committee and will include consultation, as appropriate, with interested parties.

### 2. The objectives of the CCTV System are to:

- protect the School buildings and their assets;

- increase personal safety and reduce the fear of crime;
- support the Police in a bid to deter and detect crime;
- assist in identifying, apprehending and disciplining offenders;
- protect members of the public and private property whilst on school premises;
- reflect on behavioural instances of pupils;
- facilitate the identification of any activity/event which might warrant disciplinary proceedings being taken against staff or students and assist in providing evidence to managers and/or to a member of staff or student against whom disciplinary or other action is, or is threatened to be taken.

### 3. **Statement of Intent**

- 3.1 The CCTV System will be registered with the Information Commissioner's Office under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice 2014 (Draft).
- 3.2 The School will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.
- 3.3 Cameras will be used to monitor activities within all perimeter areas of the buildings to protect for arson, all classrooms and communal walk ways to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the School, together with the wellbeing of school personnel, pupils and its visitors.
- 3.4.1 Staff have been instructed to ensure cameras are not able to focus on private homes, gardens and other areas of private property.
- 3.4.2 Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act, 2000.
- 3.5 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recorded materials will only be released to the media for use in the investigation of a specific crime and with the written authority of the Police. Recorded materials will never be released to the media for purposes of entertainment.
- 3.6 The planning and design has endeavoured to ensure that the CCTV System will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.
- 3.7 Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the School CCTV.

### 4. **Operation of the CCTV System**

- 4.1 The system will be administered and managed by Charlotte Eaton, in accordance with the principles and objectives expressed in this Policy.
- 4.2 The CCTV system will be operated 24 hours per day, 365 days per year.

### 5. **Operational Control**

- 5.1 The Operational Controller will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.
- 5.2 The System Administrator will ensure that all staff involved with the operation of the CCTV system are properly trained and fully understand their roles and responsibilities in respect of data protection issues e.g.
  - a. the user's security policy (procedures to have access to recorded images);
  - b. the user's disclosure policy;
  - c. rights of individuals in relation to their recorded images.

Training records will be maintained accordingly.

- 5.3 Access to the viewing monitors will be strictly limited to selected senior and administrative staff together with those directly involved in the security of the School.
- 5.4 Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.
- 5.5 Staff, visitors and others entering areas with CCTV viewing monitors will be subject to particular arrangement as outlined below.
- 5.6 Authorised staff must satisfy themselves over the identity of any other visitors and the purpose of their visit.
- 5.7 If an emergency arises out of hours, permission must be obtained from the Headteacher to view or process recorded material.
- 5.8 Other operational functions will include maintaining recorded materials and hard disc space, filing and maintaining occurrence and system maintenance logs.
- 5.9 Incidents involving the Emergency Services must be notified to the Headteacher.

## 6. **Liaison**

Liaison meetings will be held as required with all staff involved in the support of the system.

## 7. **Monitoring Procedures**

- 7.1 Camera surveillance is to be maintained at all times.
- 7.2 Pictures will be continuously recorded or when activated by movement.
- 7.3 No covert monitoring will be undertaken until the circumstances have been considered by, and written authorisation obtained from the Headteacher.
- 7.4 Covert surveillance activities of law enforcement agencies are not covered here as they are governed by the Regulation of Investigatory Powers Act (RIPA) 2000.
- 7.5 Prior to any request for covert surveillance to be considered, the applicant must be able to justify the request as being exceptional for the following reasons:
  - the monitoring relates to behaviour, not to contract performance;

- it is carried out to investigate a suspected criminal activity or malpractice;
- informing staff is likely to prejudice the above purpose and certain standards for covert monitoring are complied with.

The standards relating to covert monitoring are satisfied if:

- specific criminal activity has been identified;
- a need to obtain evidence by covert monitoring is established;
- following assessment, it is concluded that informing employees would prejudice the gathering of evidence;
- a time period for monitoring has been identified; and
- the provisions of RIPA are complied with.

At the conclusion of any investigation, all covert cameras must be removed from their location(s) and all none relevant data destroyed as soon as possible.

## **8. Recorded Material Procedures**

8.1 In order to maintain and preserve the integrity of the recorded material used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

- Each item of recorded material must be identified by a unique mark.
- Before use each item on which images will be recorded must be cleaned of any previous recording.
- The person making the recording shall register the date and time of recorded material insert, including recorded material reference.
- Any recorded material required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure recorded material store. If recorded material is not copied for the Police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed, signed by the controller, dated and returned to the evidence material store.
- If the recorded material is archived the reference must be noted.

8.2 Recorded materials may be viewed by the Police for the prevention and detection of crime, authorised officers of the Police for supervisory purposes, authorised demonstration and training.

8.3 A record will be maintained of the release of recorded materials to the Police or other authorised applicants. A register will be made available for this purpose kept by Interserve FM.

8.4 Viewing of recorded materials by the Police must be recorded in writing and in a log book. Requests by the Police can only be actioned under section 29 of the Data Protection Act, 1998.

- 8.5 Should recorded material be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1. Recorded materials will only be released to the Police on the clear understanding that the recorded material remains the property of the school, and both the recorded material and information contained on it are to be treated in accordance with this document.
- 8.6 The School retains the right to refuse permission for the Police to pass to any other person the recorded material or any part of the information contained thereon. On occasions when a Court requires the release of an original recorded material this will be produced from the secure recorded material store, complete in its sealed bag.
- 8.7 If the Police require the School to retain the stored recorded materials for use as evidence in the future, such recorded materials will be properly indexed and properly and securely stored until they are needed by the Police.
- 8.8 Applications received from outside bodies (e.g. solicitors) to view or release recorded materials will be referred to the Head Teacher. In these circumstances recorded materials will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. If there are uncertainties as to the validity of any request, clarification should be sought initially from the MAC Accounting Officer

A fee can be charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

## 9. **Record Keeping/Incident Logs**

The School will maintain comprehensive records relating to the management of the system and incidents. Model documents from the installers/providers of CCTV system may be utilised for this purpose.

## 10. **Retention of Data**

- 10.1 There are no specific guidelines about the length of time data images should be retained. Consequently, the period of retention will be determined locally, will be documented and understood by those operating the system and will be for the minimum period necessary to meet the objectives of the CCTV scheme. A period of 30 days is considered adequate unless determined otherwise (see 10.2 below)
- 10.2 Where CCTV data is required to assist in the prosecution of a criminal offence, data will need to be retained until collected by the Police.
- 10.3 Measures to permanently delete data should be clearly understood by persons that operate the system. These may be achieved by means of regular rotation of video tape(s) to ensure old data is overwritten or adjusting the image quality on disc based systems to ensure data is overwritten after a set period.
- 10.4 Systematic checks should be carried out to ensure the deletion regime is strictly followed.

## 11. **Breaches of the Policy (including breaches of security)**

Any breach of the Policy by School staff will be initially investigated by the System Administrator to determine disciplinary action, if necessary, and to make recommendations on how to remedy the breach.

## 12. **Assessment of the CCTV System**

An annual assessment will be undertaken by the Head Teacher to evaluate the effectiveness of the CCTV system.

The outcome of the assessment will be reported to a meeting of the Academy Committee who will determine if the system is achieving the objectives of the scheme, or if the system requires modification.

## 13. **Complaints**

Any complaints about the School's CCTV system should firstly be made, in writing, to the Head Teacher. Complaints will be investigated in accordance with section 11 of this document.

## 14. **Access by the Data Subject**

- 14.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.

If the individual is not the focus of the footage i.e. they have not been singled out or had their movements tracked then the images are not classed as 'personal data' and the individual is not entitled to the image under the provisions of Subject Access – Data Protection Act 1998.

- 14.2 Requests for Data Subject Access should be submitted via an enquiry form (see Annex A) submitted to the Head Teacher.

## 15. **Public Information**

Copies of this Policy will be available to the public from the School's website.

## 16. **Further Information**

Information and advice about the operation and maintenance of the Schools CCTV systems is available from the Premises Staff (tel: 01782 615636).

The Information Commissioners website [www.ico.org.uk](http://www.ico.org.uk) will contain the most up to date information and should be consulted on a regular basis to ensure all elements of this policy continue to reflect current guidance.

## 17. **Summary of Key Points**

- 17.1 The CCTV system is operated by Premises staff on behalf of the school.
- 17.2 The CCTV system will be reviewed annually to evaluate its effectiveness and the Academy Committee will determine if the system is achieving the objectives of the scheme or if modifications are required.
- 17.3 Liaison meetings may be held with the Police and other bodies when a requirement is identified.
- 17.4 Recorded materials will be properly indexed, stored and destroyed after an appropriate period. A period of 19 days is considered adequate unless determined otherwise.
- 17.5 Recorded materials may only be viewed by authorised School staff and the Police.
- 17.6 Recorded materials required as evidence will be properly recorded witnessed and



*The date*

**Re: Subject Access Request - CCTV Footage from St Mary's Catholic Primary School**

Dear Data Protection Officer,

Please provide me with the information about me that I am entitled to under the General Data Protection Regulation. This is so I can be aware of the information you are processing about me, and verify the lawfulness of the processing.

Here is the necessary information:

Relationship with the school	Please select: Pupil / parent / employee / governor / volunteer  Other (please specify):
Correspondence address (if different from above)	
Contact number	
Email address	
Details of the information requested	Please provide me with: <i>Insert details of the information you want that will help us to locate the specific information. Please be as precise as possible, for example:</i> <ul style="list-style-type: none"><li>• CCTV footage from camera number # on [date] between [time] and [time]</li></ul>
Details of any staff (name and/or appointment) that may have the requested information:	

If you need any more information from me, or a fee, please let me know as soon as possible.

Please bear in mind that under the GDPR you must supply me with the information within 1 month.

If you need any advice on dealing with this request, you can contact the Information Commissioner's Office on 0303 123 1113 or at [www.ico.org.uk](http://www.ico.org.uk)

Yours sincerely,

*Signature*



