



St Anne's RC Primary

'We Grow Together in God's Love'



CCTV Policy for St Anne's RC Primary School

Effective Date: Jan 2025

MISSION STATEMENT

We grow together as a Catholic Faith Community, as we follow and promote Gospel values in all we do. We grow together in wisdom, as we encourage each child to achieve their full potential, academically, spiritually, and socially, in a spirit of confidence. We grow together in respect, friendship, and responsibility, as we reach out to those in our wider community.

We Grow Together in God's Love.

RATIONALE

We seek to encourage each child to develop his or her individual abilities: spiritual, academic, and social, as fully as possible and in a spirit of confidence.

PURPOSE

The purpose of this policy is to regulate the management, operation, and use of the CCTV system (Closed Circuit Television) at St Anne's RC Primary School. CCTV systems are installed on the premises to enhance the security of the building and its associated equipment, as well as to create awareness among occupants that a surveillance security system is operational within and around the premises during both daylight and night hours.

CCTV surveillance at the School is intended for the following purposes:

- Protecting the School buildings and assets during and after school hours.
- Promoting the health and safety of staff, pupils, and visitors, as well as monitoring student behaviour.
- Preventing bullying.
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
- Supporting the police in deterring and detecting crime.
- Assisting in identifying, apprehending, and prosecuting offenders.
- Ensuring that School rules are respected for proper management.

The system does not have sound recording capability. The CCTV system is owned and operated by the School, with deployment determined by the School's leadership team. The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and members of the School community.

The School is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and the UK General Data Protection Regulation (UKGDPR) 2016/679. All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are made aware of their responsibilities in following the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

1. SCOPE

This policy relates to the location and use of CCTV and the monitoring, recording, and subsequent use of such recorded material. The School complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use.

CCTV warning signs will be clearly and prominently placed at the main external entrance to the School. Signs will contain details of the purpose for using CCTV and contact details for the School.

In areas where CCTV is used, the School will ensure that there are prominent signs placed within the controlled area. The planning and design have endeavoured to ensure that the system will give maximum effectiveness and efficiency, but it is not guaranteed that the system will cover or detect every single incident in the areas of coverage.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies and related legislation. Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation of privacy. Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the School or a student attending the School. All CCTV systems and associated equipment will be required to comply with this policy following its adoption by the School.

CCTV monitoring will never be used to observe or monitor a member of staff's performance. Recognisable images captured by CCTV systems are 'personal data' and are therefore subject to the provisions of the UK General Data Protection Regulation and Data Protection Act 2018.

2. LOCATION OF CAMERAS

The cameras are sited to capture images relevant to the purposes for which they have been installed, and care will be taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered to comply with legislation. The School will make every effort to position the cameras so that their coverage is restricted to the School premises, which includes both indoor and outdoor areas.

CCTV will NOT be used in classrooms but will be installed in limited areas within the School identified by staff and pupils as not being easily monitored.

Members of staff will have access to details of where CCTV cameras are situated. CCTV Video Monitoring and Recording of Public Areas may include the following:

- Protection of school buildings and property: The building's perimeter, entrances and exits, playground areas.
- Monitoring of Access Control Systems: Monitor and record restricted access areas at entrances to buildings and other areas.
- Verification of Security Alarms: Intrusion alarms, exit door controls, external alarms.
- Video Patrol of Public Areas: Parking areas, main entrance/exit gates, traffic control.
- Criminal Investigations (carried out by the police): Robbery, burglary, and theft surveillance.

3. ACCESS TO CCTV IMAGES

Access to recorded images will be restricted to staff authorised to view them and will not be made widely available. Supervising the access and maintenance of the CCTV System is the responsibility of the Headteacher. The Headteacher may delegate the administration of the CCTV System to another staff member or IT provider. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

4. SUBJECT ACCESS REQUESTS (SAR)

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the UKGDPR. All requests should be made in writing to the Data Protection Officer, Mrs. A Wainwright, Email: info@stannesrc.oldham.sch.uk. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified, such as time, date, and location.

The applicant may view the CCTV footage if available. The School will respond to requests within one calendar month of receiving a valid request. The School reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

5. ACCESS AND DISCLOSURE OF IMAGES TO THIRD PARTIES

There will be no disclosure of recorded data to third parties other than in circumstances where this can be done lawfully in accordance with the DPA18/UKGDPR and the third party has demonstrated it is necessary and proportionate. If an order is granted by a Court for disclosure of CCTV images, this should be complied with. However, very careful consideration must be given to exactly what the Court order requires. If there are any concerns about disclosure, the Data Protection Officer should be contacted in the first instance, and appropriate legal advice may be required. Requests for images should be made in writing to the Headteacher/SBM.

6. RESPONSIBILITIES

The Headteacher will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy.

- Oversee and coordinate the use of CCTV monitoring for safety and security purposes within the School.
- Ensure that all existing CCTV monitoring systems are evaluated for compliance with this policy.
- Ensure that CCTV monitoring is consistent with the highest standards and protections.
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.
- Ensure that monitoring recorded tapes are not duplicated for release.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally.
- Give consideration to both student and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the School and be mindful that no such infringement is likely to take place.
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy”.
- Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only.
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 28 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil).
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage, etc., and not to monitor individual characteristics.
- Ensure that camera control does not infringe an individual’s reasonable expectation of privacy in public areas.

7. PRIVACY

CCTV has the potential to be privacy intrusive. The School will consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and addresses a pressing need identified.

8. POLICY REVIEW

The Data Protection Officer is responsible for monitoring and reviewing this policy. This policy will be reviewed annually. Additionally, changes to legislation, national guidance, codes of practice, or commissioner advice may trigger interim reviews.