



SAINT AUGUSTINE'S RC HIGH SCHOOL

CCTV POLICY

Date approved by Governors: December 2018
Review Date: May 2020*

CCTV Policy

1. Introduction

The purpose of this of this policy is to regulate the use of Close Circuit Television (CCTV) and its associated technology in the monitoring of both the internal and external environs of St. Augustine's RC High School.

CCTV is installed internally and externally in the premises for the purpose of enhancing security of the building and supporting good discipline around school.

This policy applies to all personnel, and relates directly to the location and use of CCTV, the monitoring, recording and subsequent use of recorded materials.

The system is owned by the school and comprises a number of fixed and moving cameras located around the school site. All cameras are monitored from the Site Manager's Office and access to images is only available to selected senior staff (members of the Senior Leadership Team) on the Administrative Network.

This policy has due regard to legislation and statutory guidance, including, but not limited to the following:

- The Regulation of Investigatory Powers Act 2000
- The Protection of Freedoms Act 2012
- The General Data Protection Regulation (GDPR)
- The Data Protection Act 1998
- The Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998
- The Children Act 1989
- The Children Act 2004
- The Equality Act 2010

2. Objectives of the School CCTV scheme

- To protect the school buildings and assets
- To increase personal safety
- To assist in identifying, apprehending and prosecuting offenders
- To protect members of the public and private property
- To assist in managing the school

System specification

- There are 30 cameras on the system – 18 external and 12 internal.
- The software is provided by HikVision- Intelligent Video Monitoring System
- Sound recording is not enabled
- It is operated and owned by the school
- Deployment is determined by the Headteacher

Operation of the system

- The Headteacher is responsible for the operation of the CCTV system and for ensuring compliance with this policy.
- Breaches of the policy by staff monitoring the system may constitute a disciplinary matter under the relevant conditions of employment.
- Any concerns in respect of the system's use or regarding compliance with this policy should be addressed to the Headteacher.
- The system will be administered by the Network Manager along with relevant site staff; working in accordance with the principles and objectives expressed in this policy.
- The CCTV system will be in operation 24 hours each day, for every day of the year.
- The Network Manager will check on a weekly basis that the system is operating effectively and in particular that the equipment is properly recording and that cameras are functional.
- The system will be regularly serviced and maintained.

Control and access to the CCTV system

- The Headteacher has overall responsibility for the control of images and deciding how the CCTV system is used.
- The school's CCTV Scheme is registered with the Information Commissioner
- Access to the CCTV system will be strictly limited to authorised operators with a password. It is accessible only by designated staff with responsibility for security, behaviour or attendance. Only the Headteacher (or Deputy Headteacher in the Headteacher's absence) may download / record CCTV images.
- Unless in an immediate response to events, staff using the CCTV software must not direct cameras at an individual or a specific group.
- Operators must satisfy themselves that all persons viewing CCTV material have the right to do so.
- Access to the control of the CCTV system must be kept secure.
- Administrative functions will include controlling and maintaining downloaded digital materials, and maintenance and system access logs.
- Any changes to CCTV monitoring will be subject to consultation with staff and the school community.
- All operators and employees with access to images are aware of the procedures that need to be followed when accessing recorded images. This access includes viewing live images and remote playback but not the downloading / recording of data.
- All operators will receive training in respect of their responsibilities under the CCTV Code of Practice (<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>)
- All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

The following people have access to the cameras:

- Members of the Senior Leadership Team
- Network Manager
- Site Manager

Siting the Cameras

- Cameras are sited so they only capture images relevant to the purposes for which they are installed and care is taken to ensure that reasonable privacy expectations are not violated. The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the GDPR regulations.
- The school makes every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.
- CCTV is not used in standard classrooms. Cameras are positioned in the IT area outside the technology workshop, as this is an area where pupils congregate during break and lunchtimes.
- Members of staff have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.
- CCTV may be used in toilet areas but must only cover communal hand washing areas and not toilets / urinals.

Covert Monitoring

The school may in exceptional circumstances set up covert monitoring. For example;

- where there is good cause to suspect that illegal or unauthorised action(s) are taking place, or where there are grounds to suspect serious misconduct.
- where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from the Headteacher. Covert monitoring must cease following completion of an investigation. Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example, toilets.

Storage and Retention of CCTV images

- Data is routinely held on the school server for a maximum of 6 days at which point it is automatically deleted.
- Downloading of images / video for any reason must only take place with the permission of the Headteacher or Deputy Headteacher.
- Recorded data will not be retained for longer than is necessary.
- While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.
- All retained data will be stored securely.

Access to CCTV images

- Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

Subject Access Requests (SAR)

- Individuals have the right to request access to CCTV footage relating to themselves under GDPR regulations.
- All requests should be made in writing to the Headteacher.
- Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
- The school will respond to requests within 40 calendar days of receiving the written request and fee. A fee of £10 will be charged per request.
- As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data. If it is not possible to conceal the identity of others, disclosure is unlikely.
- Refusal to disclose images may be appropriate where its release is likely to cause substantial and unwarranted damage to an individual or it is likely to prejudice the legal rights of individuals or jeopardise an ongoing investigation.

Access to and Disclosure of Images to Third Parties

- 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.
- Requests for access should be made in writing to the Headteacher.
- 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.

Complaints

- Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher at the school.
- If the issue remains unresolved, complainants should follow the school Complaints policy.
- If the issue remains unresolved, and the complainant considers that the school is not operating within the Code of Practice as issued by the Information Commissioners Office, they are advised to contact the Information Commissioners Office via www.ico.org.uk.

(*Reviewed March 2020 – pending Full Governing Body approval)