



St Bede's Catholic High School

CCTV Policy

1 Policy Statement

- 1.1 St Bede's uses Close Circuit Television ("CCTV") within the premises of the school. The purpose of this policy is to set out the position of the school as to the management, operation and use of the CCTV at the school.
- 1.2 This policy applies to all members of our Workforce, visitors to the school premises and all other persons whose images may be captured by the CCTV system.
- 1.3 This policy takes account of all applicable legislation and guidance, including:
 - 1.3.1 General Data Protection Regulation ("GDPR")
 - 1.3.2 *Data Protection Act 2018* (together the Data Protection Legislation)
 - 1.3.3 CCTV Code of Practice produced by the Information Commissioner
 - 1.3.4 Human Rights Act 1998
- 1.4 This policy sets out the position of the school in relation to its use of CCTV.
- 1.5 The school is committed to ensuring respect, objectivity, belief in the dignity of the individual, consistency and fairness in relation to data protection within a Catholic school.

2 Purpose of CCTV

- 2.1 The school uses CCTV for the following purposes:
 - 2.1.1 To provide a safe and secure environment for pupils, staff and visitors within a Catholic school
 - 2.1.2 To prevent the loss of or damage to the school buildings and/or assets
 - 2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

3 Description of system

- 3.1 The CCTV systems in school have the capability of recording movement and sound in various locations throughout the school. There are 42 cameras in total. All the cameras are fixed. There are six sound recording cameras; these are located in Reception, Medical Room, Music entrance, Sports Hall entrance and two in the Humanities block.

4 Siting of Cameras

- 4.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.
- 4.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The school will make all reasonable efforts to ensure that areas outside of the school premises are not recorded.
- 4.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.
- 4.4 Cameras will not be sited in areas where individual have a heightened expectation of privacy, such as changing rooms.

5 Privacy Impact Assessment

- 5.1 Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by the school to ensure that the proposed installation is compliant with legislation and ICO guidance.
- 5.2 The school will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

6 Management and Access

- 6.1 The CCTV system will be managed by the school IT Network Manager. In the absence of the Network Manager, the day to day running of the CCTV system will be managed by the Headteacher.
- 6.2 On a day to day basis the CCTV system will be operated by the school Premises Manager.
- 6.3 The viewing of live CCTV images will be restricted to the site staff, Year Leaders and Senior Leadership Team.
- 6.4 Recorded images which are stored by the CCTV system will be restricted to access by the Premises Manager, Year Leaders, and Senior Leadership Team.

- 6.5 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- 6.6 The CCTV system is checked annually by the school's service engineers. The Premises Manager checks daily to ensure that it is operating effectively

7 Storage and Retention of Images

- 7.1 Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded. All images are automatically deleted after a period of two weeks from the date of recording.
- 7.2 Recorded images are stored only for a period of two weeks unless there is a specific purpose for which they are retained for a longer period.
- 7.3 The school will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:
 - 7.3.1 CCTV recording systems being located in restricted access areas;
 - 7.3.2 The CCTV system being encrypted/password protected;
 - 7.3.3 Restriction of the ability to make copies to specified members of staff.
- 7.4 A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by the school.

8 Disclosure of Images to Data Subjects

- 8.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.
- 8.2 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the school's Subject Access Request Policy.
- 8.3 When such a request is made the Premises Manager will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.
- 8.4 If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the

individual making the request. The Premises Manager must take appropriate measures to ensure that the footage is restricted in this way.

- 8.5 If the footage contains images of other individuals then the school must consider whether:
 - 8.5.1 the request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
 - 8.5.2 the other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
 - 8.5.3 if not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
- 8.6 A record must be kept, and held securely, of all disclosures which sets out:
 - 8.6.1 when the request was made;
 - 8.6.2 the process followed by the Premises Manager in determining whether the images contained third parties;
 - 8.6.3 the considerations as to whether to allow access to those images;
 - 8.6.4 the individuals that were permitted to view the images and when; and
 - 8.6.5 whether a copy of the images was provided, and if so to whom, when and in what format.

9 Disclosure of Images to Third Parties

- 9.1 The school will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.
- 9.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.
- 9.3 If a request is received from a law enforcement agency for disclosure of CCTV images then the Premises Manager must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration

to be given to what should be disclosed, and the potential disclosure of any third party images.

9.4 The information above must be recorded in relation to any disclosure.

9.5 If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should

be contacted in the first instance and appropriate legal advice may be required.

10 Review of Policy and CCTV System

10.1 This policy will be reviewed annually.

10.2 The CCTV system and the privacy impact assessment relating to it will be reviewed annually.

11 Misuse of CCTV systems

11.1 The misuse of CCTV system could constitute a criminal offence.

11.2 Any member of staff who breaches this policy may be subject to disciplinary action.

12 Complaints relating to this policy

12.1 Any complaints relating to this policy or to the CCTV system operated by the school should be made in accordance with the school Complaints Policy.

CCTV PRIVACY IMPACT ASSESSMENT

1 Who will be captured on CCTV?

Pupils, staff, parents / carers, volunteers, Governors and other visitors including members of the public

2 What personal data will be processed?

Facial Images, behaviour and sound

- 3 What are the purposes for operating the CCTV system? Set out the problem that the school is seeking to address and why the CCTV is the best solution and the matter cannot be addressed by way of less intrusive means.

To provide a safe and secure environment for pupils, staff and visitors within a Catholic school

To prevent the loss of or damage to the school buildings and/or assets

To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

- 4 What is the lawful basis for operating the CCTV system?

Legal Obligation, public task of the school to maintain health and safety and to prevent and investigate crime

- 5 Who is/are the named person(s) responsible for the operation of the system?

Premises Manager

- 6 Describe the CCTV system, including:

- The system has been chosen to ensure clear images are produced in order that individuals can be clearly identified. Images are solely used for the purpose of maintaining the Health and Safety of all school users and to identify situations where there is loss or damage to the school building. Images are used to identify and assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.*
- Cameras are located in key positions around the school to ensure images of clear for people entering and leaving the building. Further images are available in key areas to support safeguarding of pupils, staff and visitors.*
- Cameras are located in such a way to ensure 3rd party privacy in the surrounding area.*
- Signs are located outside of the building at key entrance points such as Reception, Sports Hall, Humanities block and rear entrance. Further signage is located in the areas where voice recording is possible.*

- *The CCTV system does not allow for third party images to be blurred.*
- *Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.*

7 Set out the details of any sharing with third parties, including processors

Sharing of images is restricted outside of the school to Police and third party law enforcement agencies. School will provide images when subject access requests are to be fulfilled. Images are recorded and retained on the school servers which are within the EEA.

8 Set out the retention period of any recordings, including why those periods have been chosen

Images are retained for a maximum of two weeks unless an investigation is in progress. The images are automatically destroyed after this period.

9 Set out the security measures in place to ensure that recordings are captured and stored securely

Images are captured and stored on the school network. Access to the network is limited to the Network Manager. Operational images are restricted to the Premises Manager. Both systems are password protected.

The planning and design has endeavoured to ensure that the 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.

Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible on the site and make clear who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

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. In the absence of compelling a need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than is necessary to complete the investigation.

10 What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?

- Third party images may be captured during CCTV recordings. This cannot be avoided if we wish to ensure the Health and Safety of all stakeholders using the premises. CCTV is in operation for 24 hours a day, 365 days a year.*
 - Data is not downloaded unless an investigation is to take place. Such images are accessed by the Premises Manager.*
 - Access to the school Network is secure and reviewed regularly*
 - Data is not processed outside of the school Network and images are held securely, password protected*
- Images being disclosed to third parties would be provided via a secure email to law enforcement agencies*

11 What measures are in place to address the risks identified?

- The CCTV policy is reviewed annually.*
- The Network security is reviewed annually*
- The access to images are restricted to senior members of staff with Leadership responsibilities*

12 Have parents and pupils where appropriate been consulted as to the use of the CCTV system? If so, what views were expressed and how have these been accounted for?

Appropriate consultation has taken place with both Parents and pupils.

13 When will this privacy impact assessment be reviewed?

Annually each September. Next review Sept 21

Approval:

This assessment was approved by the Data Protection Officer:

DPO Date