

# St Alban's Catholic High School



## CCTV Policy

Approved by Full Governing Body on: 2 December 2019

Recommission: June 2021

## **1. Introduction**

1.1 St Alban's Catholic High School uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitor the school buildings and grounds in order to provide a safe and secure environment for its pupils, staff and visitors, to protect the reputation of the school and to prevent loss or damage to school property and surrounds. This policy outlines the school's use of CCTV and how it complies with the General Data Protection Regulation; it is to be read in conjunction to the School's data protection policy.

- a. The system comprises a number of fixed cameras.
- b. The system does not have sound recording capability.
- c. The system is not linked to staff or pupil attendance records.
- d. The system is not linked to automated facial recognition or number plate recognition software thus all individuals' images are anonymous until viewed.
- e. The system is in operation for 24 hours a day using continuous and motion detected recording.

1.2 The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.

1.3 The CCTV is monitored securely from the Main Reception and IT Support office. The images captured by the system are retained on-site. Access to the images is restricted to those staff authorised to view them.

1.4 The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and other stakeholders, where required.

1.5 The school's CCTV Scheme is included in the School's registration with the Information Commissioner as a data processor.

1.6 All authorised operators and employees with access to images are aware of these procedures that need to be followed when accessing the recorded images. Through this policy, all operators are made aware of their responsibilities in following the CCTV Code of Practice. The school's 'Data Controller' (Matt Baker: Headteacher) will ensure that all employees are aware of the restrictions in relation to access to and disclosure of, recorded images by publication of this policy.

## **2. Statement of Intent**

2.1 The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:

- a. <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

2.2 The School's CCTV surveillance cameras are a passive technology that only records and retains images. They are not linked to automated decision making or facial or number plate recognition software. Transmission is by cable direct to the server.

2.3 CCTV warning signs are clearly and prominently placed at the main external entrance to the school, including further signage in other outdoor areas in close proximity to camera positions. Signs will contain details of the purpose for using CCTV (see annex B). In areas where CCTV is used, the school ensures prominent signs are placed within the controlled area.

2.4 The original planning, design and installation of CCTV equipment endeavoured to ensure that the scheme will deliver 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. Siting the Cameras**

3.1 Cameras are sited so that they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated.

3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises which includes outdoor/indoor areas. The system design is sympathetic to the privacy of surrounding public and does not monitor public space outside the legitimate areas of interest for the School.

3.3 Members of staff will have access to details of where CCTV cameras are situated with the exception of cameras placed for the purpose of covert monitoring.

### **4. Covert Monitoring**

4.1 It is not the school's policy to conduct 'Covert Monitoring' unless there are 'exceptional reasons' for doing so. Any such monitoring would be temporary and be justified as 'exceptional'. The covert surveillance activities of public authorities are governed by the Regulation of Investigatory Powers Act (RIPA) 2000. Such type of recording is covert and directed at an individual or individuals. The school may, in exceptional circumstances, determine a sound reason to covert monitor via CCTV. For example:

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

4.2 In these circumstances authorisation must be obtained from a member of the senior leadership team and the school's 'Data Controller' advised before any commencement of such covert monitoring.

4.3 Covert monitoring must cease as soon as necessary, such as following completion of an investigation.

4.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles, changing areas etc.

### **5. Storage and retention of CCTV images**

5.1 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.

5.2 All retained data will be stored securely at all times and permanently deleted as appropriate / required.

5.3 Recorded images will be kept no longer than 7 days, except where there is lawful reason for doing so, such as discipline investigations. Images are automatically deleted from CCTV storage after this time.

### **6. Access to CCTV images**

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

6.2 Access to stored images will only be granted in the case of an incident. To be viewed in the course of the incident's investigation.

## **7. Subject Access Requests (SAR)**

- 7.1 Individuals have the right to request access to CCTV footage that constitutes their personal data, unless an exemption applies according to the General Data Protection Regulations.
- 7.2 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.
- 7.3 The school will respond to requests within one month of receiving the written request and any fee where disproportionate effort is required to adhere to the request.
- 7.4 Disclosure of information from surveillance systems must be controlled and consistent with the purpose(s) for which the system was established. When disclosing surveillance images of individuals, particularly when responding to subject access requests, the school will consider whether the identifying features of any of the other individuals in the image need to be obscured. In most cases the privacy intrusion to third party individuals will be minimal and obscuring images will not be required. However, consideration will be given to the nature and context of the footage.
- 7.5 The subject will be supplied with a copy of the information in a permanent form. There are limited circumstances where this obligation does not apply. The first is where the data subject agrees to receive their information in another way, such as by viewing the footage. The second is where the supply of a copy in a permanent form is not possible or would involve disproportionate effort, whereby the disproportionate effort may incur an administration fee.
- 7.6 Further guidance on SARs is within the Data Protection Policy.

## **8. Access to and disclosure of images to third parties**

- 8.1 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 (e.g. investigators).
- 8.2 Requests for images and data should be made in writing to the Head Teacher.
- 8.3 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.
- 8.4 Data transfer will be made securely and using encryption as appropriate.

## **9. Complaints**

- 9.1 Complaints about the operation of CCTV within the school should be directed to the Headteacher in the first instance.
- 9.2 Any breach of this policy by school staff will be investigated by the Headteacher in the first instance.

## Appendix A – Checklist

This CCTV system and the images produced by it are controlled by the Headteacher. The school notifies the Information Commissioner about the CCTV system, including any modifications of use and/or its purpose.

The School has considered the need for using CCTV and have decided it is required for; the prevention and detection of crime, for protecting the safety of the school's community and for supporting the investigation into student behaviour incidents. It will not be used for other purposes. The school will conduct regular reviews of our use of CCTV.

	Checked	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Yes. Nov. 2019	T. Line	November 2020
There is a named individual who is responsible for the operation of the system.	Yes. Nov. 2019	T. Line	November 2020
A system has been chosen which produces clear images that law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	Yes. Nov. 2019	T. Line	November 2020
Staff and members of the school community will be consulted about any proposal to install / amend CCTV equipment or its use as appropriate.	Yes. Nov. 2019	T. Line	November 2020
Cameras have been sited so that they provide clear images.	Yes. Nov. 2019	T. Line	November 2020
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Yes. Nov. 2019	T. Line	November 2020
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	Yes. Nov. 2019	T. Line	November 2020
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes. Nov. 2019	T. Line	November 2020
The 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.	Yes. Nov. 2019	T. Line	November 2020
Unless individually approved, images will not be provided to third parties.	Yes. Nov. 2019	T. Line	November 2020
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the data controller knows to seek advice from their Data Protection Officer.	Yes. Nov. 2019	T. Line	November 2020
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes	T. Line	Daily

## Appendix B - Impact assessment for use of surveillance CCTV in schools

This is an impact assessment statement for the use of surveillance CCTV at:

St Alban's Catholic High School  
Digby Road,  
Ipswich,  
Suffolk,  
IP4 3NJ

This assessment has been carried out by Tim Line, IT Manager

The assessment is effective from 01/11/2019 until review on 31/10/2020

The data controlling officer for the school is:

Matt Baker  
Headteacher  
01473 726178  
[mbaker@st-albans.suffolk.sch.uk](mailto:mbaker@st-albans.suffolk.sch.uk)

### A. Areas on the school site covered by installed surveillance CCTV, whether active or not:

CAMERA AREA	Purpose of cameras in this area
School Entrance – Main block	To monitor the front of the school in cases of incidents, vandalism and persons entering the school site.
Student Entrance/Playground – Main Block, external	To monitor the flow of students, behavioural issues and persons entering the school site.
Main Reception – Main block, ground floor	To monitor the entrance to the school and visitors entering the school building.
Pupil Reception – Main Block, ground floor	To monitor the flow of students, behavioural issues and persons entering the school site.
Main Block Toilets – Main Block, ground floor	To monitor access in cases of vandalism or other incidents.
Pupil Entrance – Main block, ground floor	To monitor the flow of students and behavioural issues.
Main Block 1 <sup>st</sup> floor corridor - Room 11 end	To monitor the flow of students and behavioural issues.
Main Block 1 <sup>st</sup> floor corridor – Room 19 end	To monitor the flow of students and behavioural issues.
Main Block 2 <sup>nd</sup> floor corridor - Room 21 end	To monitor the flow of students and behavioural issues.
Main Block 2 <sup>nd</sup> floor corridor – Room 29 end	To monitor the flow of students and behavioural issues.
Room 21 – Main Block, 2 <sup>nd</sup> floor	To monitor the computers/room for incidents of vandalism and behavioural issues.

<b>Sports hall corridor</b> - Technology/PE Area	To monitor the flow of students and behavioural issues.
<b>Fitness suite corridor</b> - Technology/PE Area	To monitor the flow of students and behavioural issues.
<b>Technology Corridor</b> – Outside T1/2	To monitor the flow of students and behavioural issues.
<b>Sixth Form</b> - Common room	To monitor the computers/room for incidents of vandalism and behavioural issues.
<b>Sixth Form</b> - PSA room	To monitor the computers/room for incidents of vandalism and behavioural issues.
<b>Sixth Form Terrace</b> – New sixth form block	To monitor vital interests and behavioural issues.
<b>Science Block Entrance</b> – <b>Science Block</b>	To monitor the flow of students, behavioural issues and incidents of vandalism.
<b>Science Resource Area</b> – Science Block, Right resource area	To monitor the flow of students, behavioural issues and incidents of vandalism.
<b>Science Resource Area</b> – Science Block, Left resource area	To monitor the flow of students, behavioural issues and incidents of vandalism.
<b>Student Bike Racks</b> – A block Courtyard	To monitor students bikes to prevent/identify theft and/or vandalism.
<b>Room A6</b> - A Block	To monitor the computers/room for incidents of vandalism and behavioural issues.
<b>A block Toilets</b> – A Block	To monitor access in cases of vandalism or other incidents.
<b>A block Toilets &amp; Corridor</b> – A Block	To monitor the flow of students, behavioural issues and incidents of vandalism.
<b>A Locker corridor</b> – A Block	To monitor the flow of students, behavioural issues and incidents of vandalism.
<b>A Block Drama corridor</b> - A Block	To monitor the flow of students, behavioural issues and incidents of vandalism.
<b>A Block Music corridor</b> - A Block	To monitor the flow of students, behavioural issues and incidents of vandalism.
<b>Canteen</b>	To monitor the flow of students, behavioural issues and incidents of vandalism.

#### B. Impact assessment for use of CCTV

Advantages of use of CCTV over other possible methods:

<p>Images greatly assist to identify any actions of individuals.</p> <p>Provides a safer and securer environment for pupils, staff and visitors.</p> <p>Monitors the school buildings to prevent the loss or damage to school property and its assets.</p>
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Assessment of amount of equipment used and time equipment is active:

25 internal cameras and 3 external cameras in use

Internal cameras in classrooms are active during the school opening hours (8am – 5pm) with motion detection during evenings/nights and weekends

Internal cameras in corridors are active during the hours of 8am – 5pm 7 days a week with motion detection during evenings/nights and weekends

Specific ways in which data collected will be used, including restrictions:

To reduce criminal and other actions of individuals that have a negative impact on teaching and learning

To prevent the loss or damage to school property and its assets

To ensure a safe and secure environment for pupils, staff and visitors

For stored data, the method used the maximum length of time of storage, and how the data might be used:

The data is digital stored on the school network with 7 days retention

Details of how data may be processed, by whom and what purpose(s):

Request for access is made to the IT Support System and can only be made by staff listed in the box below. IT support action and log the request and only provide the information that has been requested.

All personnel having access to data collected and stored, as part of specific duties:

Members of the Senior Leadership Team  
Pastoral Support Team (Inc. Heads of Year, Student Support Managers, Designated Safeguarding Officer)  
IT Network Manager  
Senior ICT Technician  
Premises Manager  
Any member of staff authorised by the Headteacher or Deputy Headteacher

Personnel having live video access and its purpose:

Front office staff – To assist the schools On-Call team with in and out of lesson incidents

IT Support Team – To maintain the system and ensure any technical difficulties are rectified as swiftly as possible and to facilitate approved temporary access.



Methods of notification of the presence of surveillance CCTV and other information channels:

School CCTV policy is on the school's website  
"CCTV is in operation in this area" notices placed in areas of the school where CCTV is present  
CCTV notices as you enter the school premises

Details of all method(s) by which images, or collected data, from CCTV may be streamed to any outside agency or other parties, if relevant. Restrictions on access are also included:

No access provided to outside agencies

Assessment of any possible impact of CCTV surveillance on the right to privacy, performance or general wellbeing of any individuals:

Potential impact from classroom based camera, however individuals are made fully aware of their location and purpose.

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Signed by J McCall, Chair of Governors:

Date:

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