



ST TERESA
of **CALCUTTA**
Catholic Academy Trust

St Joseph's RC Primary

CCTV Policy

Policy Level	Trust/Statutory	Ref No	ADM07
Approved by	CSEL	Approved date	13 th June 2024
Responsibility	DPO	Next review	Autumn 2025
Published location			
Version number	Date Issued	Author	Director of Digital Learning & ICT
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1.0 Policy Statement

1.1 The Trust's contact details are as follows:

St Teresa of Calcutta Catholic Academy Trust (STOC)

Imperial House

Hornby Street

Bury

BL9 5BN

admin@stoccat.org.uk

1.2 The Trust's Data Protection Officer's contact details are as follows:

Jennifer Bonson

St Teresa of Calcutta Catholic Academy Trust (STOC)

Imperial House

Hornby Street

Bury

BL9 5BN

jbonsen@stoccat.org.uk

1.3 The Trust is committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible to the appropriate individuals. In line with the requirements of UK GDPR, the Trust also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

1.4 The purpose of this policy is to clarify and regulate the operation and use of CCTV systems within all schools in the St Teresa of Calcutta Catholic Academy Trust. STOC uses closed circuit television images to;

- a) Detect, prevent and reduce crime and loss or damage to property.
- b) Monitor school / Trust buildings to provide a secure environment for the safety and security of employees, pupils and visitors.
- c) To assist in the investigation of suspected breaches of the school / Trust policy and regulations by employees and pupils.

Cameras will be positioned so that they only capture images for the purposes described above for which they are used. STOC seeks to operate its CCTV system in a manner that is consistent with respect for an individual's privacy. The policy aims to reassure those people whose images are being captured that these images are being handled appropriately and safely in accordance with data protection principles.

1.5 This document complies with the requirements set out in the UK GDPR and Data Protection Act 2018.

2.0 Data Protection Legislation

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 continued use. The Code of Practice is published at:

The use of CCTV, and the associated images, is covered by the General Data Protection Regulations (GDPR) 2018. This policy outlines the school's use of CCTV and how it complies with the regulations.

The General Data Protection Regulation require that personal data shall be;

- a) Processed lawfully, fairly and in a transparent manner,
- b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes,
- c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed,
- d) Accurate and, where necessary, kept up to date,
- e) Kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data is processed,
- f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3.0 (INSERT SCHOOL NAME) Policy Statement

- 3.1 **St Joseph's RC Primary**, uses closed circuit television (CCTV) on its premises and buildings for the purposes as clarified in Section 1. Policy Statement (above).
- 3.2 The system comprises of **12** cameras. The school uses **fixed cameras**. St Joseph's RC Primary has CCTV cameras positioned in the following locations; **Entrance, Playground and Car Park**.
- 3.3 Cameras will be sited so they only capture images relevant to the purposes for which they are 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 ensure that images captured comply with GDPR. The planning and design of the system should minimise the invasion of privacy and cameras will not be located in any areas which are reasonably expected to be private for example toilets or changing rooms.
- 3.4 The system **does not** have sound recording capability.
- 3.5 The CCTV system is owned and operated by the school and the deployment of which is determined by the school's leadership team in consultation with the local Governing Body.
- 3.6 The CCTV system is monitored from Office by Headteacher or Member of SLT.
- 3.7 The introduction of, or changes to, CCTV monitoring will be shared with staff and the community and agreed with the local Governing Body.

3.8 Usage of the CCTV systems, software and data will be strictly limited to authorised operators. All authorised operators and employees approved to access images are aware of the procedures that need to be followed when accessing CCTV images. All operators have been trained in their responsibilities. All employees are aware of the restrictions in relation to the storage, access and disclosure of CCTV images. All authorised operators are required to sign the CCTV Agreement contained in appendix two of this policy.

3.9 Any breaches or concerns in respect of this policy will be reported to the Trust Data Protection Officer (DPO). CCTV systems and their security are audited annually as part of school's data protection arrangements.

4.0 Policy and Procedure

4.1 General Points

All images and sound recorded by CCTV systems shall remain the property and copyright of the St Teresa of Calcutta Catholic Academy Trust. Only suitably trained and competent staff or contractors with the relevant knowledge and experience will be employed to install and maintain equipment.

4.2 Signage

It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. All schools in the trust will ensure adequate signage to meet this requirement including at all entrances of a school with CCTV.

4.3 Retention of Data

Recorded data will not be retained for longer than is necessary with reference to the purpose of CCTV surveillance. While retained, the integrity of the recordings will be securely maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

Unless required for evidential purposes, the investigation of an allegation or as required by law, CCTV images will be retained for no longer than 30 days from the date of recording.

4.4 Positioning of Cameras

Cameras will be sited so they only capture images relevant for the purposes for which they are installed which is confirmed in Section 2. of this policy. Images of visitors as well as pupils and staff will be captured as part of the CCTV systems surveillance. However, the planning and design of the system should minimise the invasion of privacy in their use for their stated purpose. Cameras will not be located in any areas which are reasonably expected to be private for example toilets or changing rooms.

4.5 Security

All images shall be stored securely in an encrypted format. Any unnecessary footage captured will be securely deleted from the system or overwritten.

4.6 Covert Monitoring

Covert monitoring should not normally be considered, and should only be used in exceptional circumstances, for example;

- a) Where there is good cause to suspect criminal activity or equivalent malpractice which may constitute gross misconduct.
- b) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances HR must be involved in the decision and written authorisation must be obtained from a member of the Academy Council.

4.7 Access to CCTV Images

Access to recorded images will be restricted to those staff authorised to view them by the Principal in consultation with HR and statutory requirements. A list of staff authorised to view CCTV images will be maintained by the academy within the 'Checklist of CCTV Operation' contained in appendix one. The academy will maintain a log of when CCTV is accessed and viewed.

4.7.1 Subject Access Requests

Individuals have the right to request access to CCTV footage relating to themselves. All requests must be made in writing to the Headteacher. Sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

The Academy will respond to requests within 30 calendar days of receiving the written request. The academy must verify the identity of the person making the request before any information is supplied. This must be done in person with appropriate identification documents for example a passport or driving licence. Where a request has been made electronically, the information will be provided in a commonly used electronic format.

Information will be normally supplied to the individual free of charge. However, the academy will charge a reasonable fee where a request is manifestly unfounded, excessive or repetitive.

The Trust / 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. Where images of other individuals are on the CCTV footage their permission will be sought before this is allowed.

4.7.2 Third Party Access

There will be no disclosure of recorded data to third parties other than to authorised bodies such as the police.

The data may be used within the trust / academies HR policies for example discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

4.8 Complaints

Enquires or complaints about the operation of CCTV within the school should be made in accordance with the STOC Complaints Policy and Procedure.

Failure of authorised operators to comply with the requirements of this policy will lead to disciplinary action under the Trusts / School's Disciplinary Policy.

Appendix One

St Joseph's RC Primary School: Checklist of CCTV Operation

The school's CCTV system and the images produced are controlled in line with this policy and relevant legislation.

As part of this the data controller will complete and review annually the Checklist of CCTV Operation. The school leadership team in conjunction with local Governing Body are responsible for ensuring compliance with the provisions set down in this policy and its appropriate implementation and communication.

ACTION	NAME	DATE	REVIEW DATE
The next renewal date is recorded.			
The name of the person(s) responsible for the operation of the system is; _____			
The reason for using CCTV has clearly been defined and installation / use of cameras is an appropriate solution.			
The system is checked to verify it produces clear images which law enforcement bodies can use to investigate crime, these can easily be taken from the system when required.			

Employees and visitors are consulted and informed about proposed installation and / or continued use of CCTV.			
The potential impact on privacy has been identified and considered with reference to the its purpose.			
ACTION	NAME	DATE	REVIEW DATE
Cameras are located in the following areas;			
Cameras have been positioned to avoid intentionally capturing the images of persons not visiting the premises.			
The academy has adequate and visible signage showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the signs.			
Images from this CCTV system are securely stored in _____ and access is limited to the following authorised persons;			
Recorded images will be deleted after 30 days, unless they form part of an issue under investigation.			

Regular checks are carried out to ensure that the system is working properly and produces clear images.			
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Appendix Two

CCTV Agreement (for Authorised Operators)

Name: Emma Graves

Role: Headteacher

Please tick the box to indicate you agree to act in accordance with the statement.

Unless explicitly told to do so by the DPO, staff members with access to the school's CCTV footage:

- Will not share footage with others.
- Will not allow others access to footage.
- Will not download footage.
- Will not remove CCTV data from the room in which it is stored.
- Will not leave the storage room unlocked or unsecured.

Signature: Emma Graves (Headteacher)

Date: 13th June 2024
