



**OLSJ**  
OUR LADY + ST JOSEPH  
CATHOLIC PRIMARY SCHOOL

***CCTV POLICY***  
***OUR LADY & ST JOSEPH CATHOLIC PRIMARY***  
***SCHOOL***

PREPARED BY: S BLOM

APPROVED BY: Governing Body

DATE: May 2018

REVIEW DATE: November 2021

DPO Checked: May 2018



## **1 Introduction**

- 1.1 Our Lady & St Joseph Catholic Primary School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.
- 1.2 The system comprises a number of fixed cameras.
- 1.3 The system does not have sound recording capability.
- 1.4 The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team.
- 1.5 The CCTV is unmonitored although a live stream is viewable in the school office during school opening hours only.
- 1.6 Changes to CCTV monitoring will be subject to consultation with staff and the school management and risk assessment.
- 1.7 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings is covered by the Data Protection Act 2018. This policy outlines the school's use of CCTV and how it complies with the Act.
- 1.8 From 25<sup>th</sup> May 2018, the DPA will be replaced by the General Protection Regulation (GDPR) and this policy will conform to the new regulations.
- 1.9 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are trained by the school data controller in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

## **2 Statement of Intent**

- 2.1 The school complies with 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:  
  
<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>
- 2.2 CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including school gates if coverage includes outdoor areas. Signs will contain details of the purpose for using CCTV (see appendix B). In areas where CCTV is used, the school will ensure that there are prominent signs with contact details, placed at both the entrance of the CCTV zone and within the controlled area.



- 2.3 The planning and design has endeavoured to ensure that the Scheme 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.

### **3 Siting the Cameras**

- 3.1 Cameras are sited so they only capture images relevant to the purposes for which they are installed (see introduction above) 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 the Data Protection Act.
- 3.2 The school has made every effort to position cameras so that their coverage is restricted to the school premises but cannot guarantee capturing events outside the school areas around entrances and exits where security cameras are placed. Every effort has been made to ensure these instances are mitigated, with the sole intention being the protection of the school premises, its pupils, staff and visitors.
- 3.3 CCTV will not be used in classrooms but in areas within school that have been identified by staff and pupils as not being easily monitored.
- 3.4 Members of staff should 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 The school may in exceptional circumstances set up covert monitoring. For example:
- i) 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;
  - ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- 4.2 In these circumstances authorisation must be obtained from the Headteacher.
- 4.3 Covert monitoring must cease 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.

### **5 Storage and Retention of CCTV images (including the time frame of 30 days)**

- 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.

## **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.

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

7.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act and to be replaced by its successor the General Data Protection Regulation (GDPR) which comes into effect 25<sup>th</sup> May 2018

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 40 calendar days of receiving the written request and fee. From the 25<sup>th</sup> May 2018, the mandatory response period is being reduced to 30 days from written request.

7.3 The current fee of £10 chargeable per request will be abolished from 25<sup>th</sup> May 2018 under GDPR legislation. However, "reasonable" fees can be charged for unfounded, excessive or repetitive requests.

7.4 The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

7.5 The Access Log Register (Appendix C) will be completed by the School Premises Manager as requests are received.

## **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 should be made in writing to the Headteacher.

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.

## **9 Complaints**

9.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.



### **Further Information**

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)
- [www.ico.gov.uk](http://www.ico.gov.uk)
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018
- General Data Protection Regulation 2018



### Appendix A – Checklist

This CCTV system and the images produced by it are overseen by the School Business Manager who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998 and its successor act under the General Data Protection Regulation commonly referred to as GDPR).

Our Lady & St Joseph Primary School has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of customers, parents and staff. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Yes 01/12/2017	SBM	01/12/2018
There is a named individual who is responsible for the operation of the system.	Yes 01/12/2017	SBM & DC	
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	Yes 01/12/2017	SBM & DC	
The problem we are trying to address has been clearly defined and installing cameras is the best solution. This decision should be reviewed on a regular basis	Yes 01/12/2017	SBM & DC	
Cameras have been sited so that they provide clear images.	Yes 01/12/2017	SBM & DC	
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Yes 01/12/2017	SBM & DC	
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 01/12/2017	SBM	
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes 01/12/2017	SBM & DC	
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 01/12/2017	SBM & DC	
Except for law enforcement bodies, images will not be provided to third parties.	Yes 01/12/2017	SBM & DC	
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.	Yes 01/12/2017	SBM & DC	
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes 01/12/2017	SBM & DC	



## Appendix B – CCTV Signage

It is a requirement of the Data Protection Act 1998 and its successor act GDPR to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

**The CCTV sign should include the following:**

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for enquiries





**Appendix C**

**ACCESS LOG**

Name of Applicant	Reason for Application for Access	Date Received	Fee Received	Signature of Applicant	Access Granted. (Date and by Whom)





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