



CLOSED CIRCUIT TELEVISION (CCTV) POLICY

1. Introduction

Closed Circuit Television (CCTV) Systems are installed in areas of St John Lloyd RC Primary School.

2. Purpose

The purpose of this policy is to regulate the use of Closed Circuit Television and its associated technology in the monitoring of both the internal and external environment. CCTV systems are installed in premises for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external environs of the premises during both the daylight and night hours each day.

CCTV is intended for the purposes of:

- * protecting the school buildings and school assets, both during and after school hours;
- * promoting the health and safety of staff, pupils and visitors;
- * reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- * supporting the Police in a bid to deter and detect crime;
- * assisting in identifying, apprehending and prosecuting offenders; and
- * ensuring that the school rules are respected so that the school can be properly managed.

3. Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

4. General Principles

St John Lloyd RC Primary School has a statutory responsibility for the protection of its property, equipment and other plant as well providing a sense of security to its employees, students and invitees to its premises. It owes a duty of care to students, parents, staff and visitors amongst others under the provisions of Safety, Health and Welfare at Work Act 2005 and associated legislation and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life of the school community by integrating the best practices governing the public and private surveillance of its premises. The use of the CCTV system will be conducted in a professional, ethical and lawful manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the individual school, including the provisions set down in equality and other educational and related legislation.

This policy prohibits monitoring based on the protected characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy. Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school or a student attending one of its schools.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by St John Lloyd RC Primary School. Recognisable images captured by CCTV systems are "personal data" and are therefore subject to the provisions of the Data Protection Act 2018.

5. Justification for use of CCTV

The Data Protection Act 2018 requires that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that St John Lloyd RC Primary School need

to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV to control the perimeter of the school buildings for security purposes has been deemed to be justified by the GB. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation. CCTV systems will not be used to monitor normal teacher/student classroom activity in school. In other areas of the school where CCTV has been installed, e.g. hallways, stairwells,

6. Location of cameras

The location of cameras is a key consideration. Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. St John Lloyd RC Primary School has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals. Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

CCTV Video Monitoring and Recording of Public Areas may include the following:

- * Protection of school buildings and property: The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services
- * Monitoring of Access Control Systems: Monitor and record restricted access areas at entrances to buildings and other areas
- * Verification of Security Alarms: Intrusion alarms, exit door controls, external alarms
- * Video Patrol of Public Areas: Parking areas, Main entrance/exit gates, Traffic Control
- * Criminal Investigations (carried out by the police): Robbery, burglary and theft surveillance

7. Covert surveillance

Where the police may request to carry out covert surveillance on school premises, such covert surveillance may require the consent of a judge. Accordingly, any such request made by the police will be requested in writing and the school will seek legal advice.

8. Informing / fairness – signage

The school will provide a copy of this CCTV Policy on request to staff, students, parents and visitors to the school. This policy describes the purpose and location of CCTV monitoring, a contact number for those wishing to discuss CCTV monitoring and guidelines for its use, and referenced in all the schools Privacy Notices.

Adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation. Adequate signage will also be prominently displayed at the entrance to the school.

Appropriate locations for signage will include:

- * at entrances to premises i.e. external doors, school gates
- * reception area
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9. Storage & Retention

The Data Protection Act 2018 states that data "shall not be kept for longer than is necessary for" the purposes for which it was obtained. A data controller needs to be able to justify this retention period. For a normal CCTV security system, it would be difficult to justify retention beyond a month (28 days), except where the images identify an issue – such as a break-in or theft and those particular images/recordings are retained specifically in the context of an investigation/prosecution of that issue.

Accordingly, the images captured by the CCTV system will be retained for a maximum of 28 days except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the school's Headteacher, who may delegate the administration of the CCTV System to another staff member. In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above (such individuals may include the Police, Chair of Governors, other members of the teaching staff, representatives of the HSE and/or the parent of a recorded pupil). When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

10. Access

Recorded footage and the monitoring equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. Access to the CCTV system and stored images will be restricted to authorised personnel only.

In relevant circumstances, CCTV footage may be accessed:

- * By the police where The Partnership Trust, its schools (or its agents) are required by law to make a report regarding the commission of a suspected crime; or
- * Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on the property
- * To the HSE and/or any other statutory body charged with child safeguarding; or
- * To assist the Senior Management Team in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- * To individuals (or their legal representatives) subject to a court order.
- * To the school's insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

Requests by the police: Information obtained through video monitoring will only be released when authorised by the Head. If the police request CCTV images for a specific investigation, the police may require a warrant and accordingly any such request made by the police should be made in writing and the school must immediately seek legal advice.

Access requests: On written request, any person whose image has been recorded has a right view the information recorded which relates to them, provided always that such an image/recording exists i.e. has not been deleted and provided also that an exemption/prohibition does not apply to the release. Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that the other person is not identified or identifiable. To exercise their right of access, a data subject must make an SAR in writing to the school.

If the image is of such poor quality as not to clearly identify an individual, that image may be considered to be not personal data and there is no obligation for the image to be handed over by the school.

11. Responsibilities

The individual school's Headteacher will:

- * Ensure that the use of CCTV systems is implemented in accordance with the policy set down by SJL
- * Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within their school
- * Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- * Ensure that the CCTV monitoring within their school is consistent with the highest standards and protections
- * Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- * Ensure that monitoring recorded tapes are not duplicated for release
- * Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- * Approve the location of temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events. NOTE: [Temporary cameras do not include mobile video equipment or hidden surveillance cameras used for authorised criminal investigations by the Police].
- * Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment

* Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place

*Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"

* Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only

* Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 28 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil)

* Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy

* Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics

* Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

* Ensure that where the Police request to set up mobile video equipment for criminal investigations, legal advice has been obtained and such activities have approval.

SECURITY COMPANIES

Where the school's CCTV system is controlled by a security company contracted by the school The following applies:

*The school has a written contract with the security company in place which details the areas to be monitored, how long data is to be stored, what the security company may do with the data, what security standards should be in place and what verification procedures apply. The written contract also states that the security company will give the school all reasonable assistance to deal with any subject access request made under the Data Protection Act 2018 which may be received by the school within the statutory time-frame (which is 30 days except for complex cases which are unlikely to apply in case of images captured on a security camera).

Security companies that place and operate cameras on behalf of clients are considered to be "Data Processors." As data processors, they operate under the instruction of data controllers. The Data Protection Act 2018 place a number of obligations on data processors. These include having appropriate security measures in place to prevent unauthorised access to, or unauthorised alteration, disclosure or destruction of, the data, in particular where the processing involves the transmission of data over a network and against all unlawful forms of processing. This obligation can be met by having appropriate access controls to image storage or having robust encryption where remote access to live recording is permitted. Staff of the security company has been made aware of their obligations relating to the security of data.

12. Implementation & Review

The policy will be reviewed and evaluated from time to time. On-going review and evaluation will take cognisance of changing information or guidelines (e.g. from the ICO, the police, Department of Education, Audit units (internal and external to the school/) national management bodies, legislation and feedback from parents/guardians, students, staff and others).

The date from which the policy will apply is the date of adoption by the Board of Trustees.

Implementation of the policy will be monitored by the Head teacher of the school. The Headteacher of the school and Governing Body, will monitor the implementation of the policy.