



# **CCTV Policy**

## **February 2023**

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## ANNEX Definition of terms

### Trust Mission Statement

We are a partnership of Catholic schools and our aim is to provide the very best Catholic education for all in our community and so improve life chances through spiritual, academic and social development.

We will achieve this by:

- Placing the life and teachings of Jesus Christ at the centre of all that we do
- Following the example of Our Lady of Lourdes by nurturing everyone so that we can all make the most of our God given talents
- Working together so that we can all achieve our full potential, deepen our faith and know that God loves us
- Being an example of healing, compassion and support for the most vulnerable in our society

*Psalm 138: 7 (GNT)*

*When I am surrounded by troubles, you keep me safe.  
You oppose my angry enemies and save me by your power.*

### **Guidance Note for School Leaders/Site Managers:**

A key element in the assessment of lawful use of CCTV systems is the privacy impact assessment (PIA) conducted in relation to those systems setting out the justification for the system and its compliance with data protection legislation.

If the Trust/School has not conducted such an assessment then this must be conducted now, and this template policy amended to take account of the outcome of that assessment.

The Trust/School should do this with an open mind, including considering whether any existing cameras should be removed or the system modified in any way.

The completed impact assessment template (see page 9) should be forwarded to the Trust DPO for sign-off/approval.

- Highlighted sections of the policy should be completed as appropriate for each setting
- The Headteacher should designate named staff members to access / view the CCTV images
- The designated manager of the CCTV system should retain the log of access to viewed images (this log should be available as part of the GDPR annual audit)
- The designated manager of the CCTV system should retain the log of disclosures to third parties (this log should be available as part of the GDPR annual audit)

# CCTV POLICY

## 1 Policy Statement

- 1.1 Sacred Heart Primary CVA uses Close Circuit Television (“CCTV”) within the premises of the school. The purpose of this policy is to set out the position of the Trust and school as to the management, operation and use of the CCTV at Sacred Heart Primary CVA.
- 1.2 This policy applies to all members of our Workforce, visitors to the 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.

## 2 Purpose of CCTV

- 2.1 Sacred Heart Primary CVA uses CCTV for the following purposes:
  - 2.1.1 To provide a safe and secure environment for pupils, staff and visitors
  - 2.1.2 To prevent the loss of or damage to the Trust or School buildings and/or assets and assist with any related financial claims/recovery
  - 2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

## 3 Description of system

- 3.1 Two static camera that do not record sound, camera a is fixed on the Foundation gate entrance which picks up the walk way and the bottom end of the carpark, and camera B is on the Main Gate which captures part of the trim-trail and the main path leading to the main entrance.
- 3.2 Visual display in the school office - facing into the office so no one can see from the public side. Both cameras or singular camera can be displayed.

## 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 Trust and 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 individuals have a heightened expectation of privacy, such as changing rooms or toilets. Cameras should not be sited in classrooms.

## **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 Trust and school to ensure that the proposed installation is compliant with legislation and ICO guidance.
- 5.2 The Trust and 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 Miss C Hornsby and the Trust.
- 6.2** On a day to day basis the CCTV system will be operated by Mrs K Drage and Mrs C Davidson
- 6.3** The viewing of live CCTV images will be restricted to Miss C Hornsby, Mr M Cordes, Mrs C Davidson and Mrs K Drage.
- 6.4 Recorded images which are stored by the CCTV system will be restricted to access by Miss C Hornsby, Mr M Cordes and the Trust.
- 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 monthly to ensure operation.

## **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.
- 7.2 Recorded images are stored only for a period of 28 days unless there is a specific purpose for which they are retained for a longer period.

- 7.3 The Trust and 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 Trust and school.

*[Unless the CCTV records a specific incident then it is unlikely to be justifiable to retain any recorded images for more than, say, 28 days.]*

## **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 [Trust's/School's] Subject Access Request Policy.
- 8.3 When such a request is made Miss Hornsby or Mr Cordes in her absence, with support from the Trust Central ICT team 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. Miss Hornsby or Mr Cordes in her absence and the Trust ICT Central Team 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 Trust and 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.

- 8.5.4 Consider providing stills from the CCTV with third parties having been redacted.
- 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 Miss Hornsby, Mr Cordes in her absence or the Trust ICT Central Team 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.

(please note that this CCTV disclosure log should be available to view at the annual GDPR Audit)

*[Please note that when a subject access request is made then, unless an exemption applies (such as in relation to third party data that it would be unreasonable to disclose) then the requester is entitled to a copy in a permanent form. We have referred only to “access” as opposed to a “permanent copy” as the [Trust/School] may consider it preferable in certain circumstances to seek to allow access to images by viewing in the first instance without providing copies of images. If an individual agrees to viewing the images only then a permanent copy does not need to be provided. However if a permanent copy is requested then this should be provided unless to do so is not possible or would involve disproportionate effort.]*

## **9 Disclosure of Images to Third Parties**

- 9.1 The Trust and 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 Miss Hornsby, Mr Cordes in her absence or a designated member of the Trust’s central team, 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 - this record should be available to view in during the annual GDPR Audit.

- 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 every 2 years.
- 10.2 The CCTV system and the privacy impact assessment relating to it will be reviewed every 2 years.

*[The privacy impact assessment (PIA) relating to the system should be reviewed regularly to ensure that the use of any CCTV system continues to be justified and is compliant with legal requirements. The [Trust/School] should ensure that it has procedures in place to ensure that the CCTV system is regularly reviewed.]*

## **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 [Trust/School] should be made in accordance with the [Trust/School] Complaints Policy.

<b>Date Reviewed</b>	<b>February 2023</b>
<b>Next Review Date</b>	<b>February 2025</b>
<b>Reviewer</b>	Trust Audit & Risk Committee / OLoL Trust Exec Board / School
<b>Author</b>	Browne Jacobson template – edited by Tamer Robson & Will Ottewell & OLoL Schools



## CCTV PRIVACY IMPACT ASSESSMENT TEMPLATE

1 Who will be captured on CCTV?

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

Any visitors to the school who enter onto the front of the school's premises  
- Pupils, staff, governors, parents, delivery drivers and other visitors.

Pupils who are playing on the trim trial and within the camera range - main path by the main gates are also on the camera.

2 What personal data will be processed?

Facial images, behaviour and movement in the area.

3 What are the purposes for operating the CCTV system? Set out the problem that the [Trust/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.

Safeguarding purposes - visitors on site, pupils - checking visitors have left/ entered the correct way.  
Crime Prevention and discouragement.

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

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

To prevent the loss of or damage to the Trust or School buildings and/or assets and assist with any related financial claims/recovery

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

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

Miss C Hornsby  
Mr M Cordes  
Mrs C Davidson  
Mrs K Drage  
Trust ICT Central Team

6 Describe the CCTV system, including:

- a. how this has been chosen to ensure that clear images are produced so that the images can be used for the purpose for which they are obtained;
- b. siting of the cameras and why such locations were chosen;
- c. how cameras have been sited to avoid capturing images which are not necessary for the purposes of the CCTV system;
- d. where signs notifying individuals that CCTV is in operation are located and why those locations were chosen; and
- e. whether the system enables third party data to be redacted, for example via blurring of details of third party individuals.

Our CCTV system was installed and recommended by the Trust. The pictures are clear and suitable for the purpose in which the system was intended.

At Sacred Heart we have two static cameras that do not record sound, camera a is fixed on the Foundation gate entrance which picks up the walk way and the bottom end of the carpark, and camera B is on the Main Gate which captures part of the trim-trail and the main path leading to the main entrance.

These locations were chosen as the main entrances to the school.

Camera were located in their positions to get the best possible view of the premises. The camera on the main gate is positioned so the holding area can be clearly seen - it does pick up children playing in the school yard.

Once the Trust ICT team have downloaded and separated the footage, they are able to manually redact data - faces on still images.

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

The Trust and school will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place but a written request must be made.

If a request is received from a law enforcement agency for disclosure of CCTV images then Miss Hornsby, Mr Cordes in her absence or a designated

member of the Trust's central ICT team, 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.

The information above must be recorded in relation to any disclosure - this record should be available to view in during the annual GDPR Audit. This is kept on the school CCTV and GDPR log (held internally)

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.

School staff will always seek advice from our DPS or DPO in any such circumstances.

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

Recordings are kept for 28 days, as recommended unless there is a specific purpose for example criminal damage or police incident. This footage, and only the footage pertinent to the incident will be kept at Trust level.

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

Images are kept Cloud based and encrypted. School have access to 28 days worth of footage and must supply a pass pattern to obtain. The Trust ICT Central Team can also obtain the footage through encrypted and password protected.

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

For example:

- Is it fair to record them in the way proposed?

Reasons for recording are all lawful as set out in the following document General Data Protection Regulation ("GDPR")

[Data Protection Act 2018] (together the Data Protection Legislation)

CCTV Code of Practice produced by the Information Commissioner

Human Rights Act 1998

- How is the amount of data processed to be minimised?

Cameras are placed strategically and do not record the public areas.

- What are the risks of the system being accessed unlawfully?

Full checks have been done on the system and the recommendations for the system has come from the Central ICT Team. Pass patterns are required in Sacred Heart to access footage. The office door is locked securely unless office staff or the headteacher in in the school building.

- What are the potential data breach risks?

Risks are that with the screen in the office offering live footage an unauthorised person seen the images - to mitigate this parents are not allowed in the main office area.

- What are the risks during any transfer of recordings, or when disclosed to third parties such as the police?

When the link is sent to a third party - for example the police the clip is password protected and sent directly to the person/ officer who has requested this as stated on the form completed. These step minimise the risk.

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

The screen in the office cannot be viewed from the public area and no members of the public or parents are not allowed in the main office area.

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?

Parents have not been consulted this year regarding the use of CCTV. It is unknown if they were consulted when the system was fitted.

13 When will this privacy impact assessment be reviewed?

2 years in line with the policy – March 2025

Approval:

This assessment was approved by the Data Protection Officer:

DPO .....

Headteacher C Hornsby

Date .....

Date 1<sup>st</sup> March 2023