



THE ARCHDIOCESE OF BIRMINGHAM

Sacred Heart Catholic Primary School



'To grow in Wisdom and in Grace'

CCTV POLICY

Approved by Governors: March 2020

Review date (Bi-Annually): March 2022

CCTV POLICY

1 Policy Statement

- 1.1 Sacred Heart Catholic Primary school uses Close Circuit Television (“CCTV”) within the premises of the School. The purpose of this policy is to set out the position of the School as to the management, operation and use of the CCTV at the School.
- 1.2 This policy applies to all members of our Workforce, visitors to the School 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.
- 1.5 The School is committed to ensuring respect, objectivity, belief in the dignity of the individual, consistency and fairness in relation to data protection within a Catholic School.

2 Purpose of CCTV

- 2.1 The School uses CCTV for the following purposes:
 - 2.1.1 To provide a safe and secure environment for pupils, staff and visitors within a Catholic School
 - 2.1.2 To prevent the loss of or damage to the School buildings and/or assets
 - 2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

3 Description of system

- 3.1 The system consists of 6 cameras, with 4 located around the outside of the main building and 2 located inside the Lodge. Footage is recorded on a recording device in the server room and displayed on a monitor in the school office. All of the cameras are fixed position and none of the cameras have sound recording ability.

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 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 individual have a heightened expectation of privacy, such as changing rooms or toilets.

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 School to ensure that the proposed installation is compliant with legislation and ICO guidance.

5.2 The 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 the Headteacher, supported by TechResponse.

6.2 On a day to day basis the CCTV system will be operated by **TechResponse**

6.3 The viewing of live CCTV images will be restricted to the Head teacher.

6.4 Recorded images which are stored by the CCTV system will be restricted to access by the Head teacher and Techresponse to ensure that it is operative efficiently.

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 by TechResponse to ensure that it is operating effectively

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 21 days unless there is a specific purpose for which they are retained for a longer period.

7.3 The 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 School.

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 School's Subject Access Request Policy.

8.3 When such a request is made the Head teacher 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. Head teacher 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 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.

8.6 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 the Headteacher in 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.

9 Disclosure of Images to Third Parties

9.1 The 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 the Head teacher 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.

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 BI-ANNUALLY.

10.2 The CCTV system and the privacy impact assessment relating to it will be reviewed BI-ANNUALLY.

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 School should be made in accordance with the School Complaints Policy.

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.]

2 What personal data will be processed?

[Facial Images, behaviour, sound, etc.]

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

[Prevention or detection of crime etc.]

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

[Legal Obligation, public task of the Academy Trust Company/School to maintain health and safety and to prevent and investigate crime]

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

Mrs Rachel Gavin (Head teacher) Matt Eustace (TechResponse)

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.

Cameras sited to safeguard staff and pupils and can only capture images on school grounds.
Signs in lodge to alert people to the cameras
The system does not enable blurring of images.

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

Law enforcement agencies, data subject, CCTV supplier and support company

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

The period is 21 days, which is sufficient time to access footage after incidents but does not result in the storage of footage for an excessive period of time.

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

The CCTV NVR is located within the server room. The system operates on a dedicated VLAN and is protected by a secure password.

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

- We process the data in a fair and lawful manor and in line with the ICO guidelines and code of conduct, we have information located around the site informing we have CCTV, we also have reference to the CCTV processing in our privacy policy.
- Data is kept for a period of between 21 days before the system writes new data over the old data

- Low risk as the system is located in a secure location with restricted access, only select staff and contractors have access to the system and can remove data
 - *What are the potential data breach risks?*
 - Loss of information, unauthorised access to the system
 - *What are the risks during any transfer of recordings, or when disclosed to third parties such as the police?*
- Loss of information, unauthorised access to the system.

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

System is password protected
Data kept for a short period of time
Limited access to system

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?

No

13 When will this privacy impact assessment be reviewed?

Bi Annually