



ST MARY'S
CE HIGH SCHOOL

St Mary's CE High School

'Everyone is equal: everyone deserves the best'

CCTV System Policy

Spring 2023

Academy Company Reg.No 07999861

"Our vision, as a school with a Christian ethos, is founded on The Parable of the Sower, where

***Through God's love, we are the rich soil where seeds flourish and roots grow,**
based on the Parable of the Sower, Mark 4: 3-9*

*This underpins our motto, **We believe everyone is equal, everyone deserves the best,** and is key to what we do. We believe that we are all equal, irrespective of our background and beliefs. We provide a safe, nurturing environment in which we can all flourish. We have the very highest aspirations for our students, their families, our local community, and ourselves, and want nothing but the best. We challenge students by having a rich and exciting curriculum provision and by making learning practical, engaging and enjoyable. We enable students to succeed by providing the best possible personalised support."*

Nicholas Simms – Head Teacher



St Mary's CE High School

CCTV System Policy

The Governing body is committed to securing the safety and well-being of employees, students and others affected by activities on school premises. The Governors of St Mary's have made safeguarding a fundamental priority and are committed to ensuring that safeguarding of children and young people remains at the core of their work. For this reason, the principles of excellent safeguarding practice are integral to the culture of St Mary's and every aspect of the school and trading company's work. This policy supports this commitment to safeguarding and should be read in conjunction with other school and trading company policies as appropriate.

It is every person's responsibility to safeguard and promote the welfare of children and it remains a paramount concern of all who work in and who are part of the St Mary's community.

Aims

- To provide a safe environment for staff and students
- To provide improved site security
- To prevent and identify vandalism and theft
- To prevent anti-social behaviour in areas around the school
- To ensure the health and safety of the staff, students and visitors to the School

1. Policy statement and objectives

- 1.1 St Mary's CE High School has in place a CCTV surveillance system on its site. The purpose of this policy is to set out the responsibilities of the St Mary's CE High School regarding the management, operation and use of the CCTV system, and details the procedures to be followed in order to ensure that St Mary's CE High School complies with relevant legislation.
- 1.2 This policy applies to all members of our staff, visitors to the site 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 UK General Data Protection Regulation ("UK GDPR")
 - 1.3.2 Data Protection Act 2018
 - 1.3.3 CCTV Code of Practice produced by the Information Commissioner's Office (ICO)
 - 1.3.4 Human Rights Act 1998
 - 1.3.5 Freedom of Information Act 2000

2. Purpose of the CCTV system

- 2.1 The principal purposes of the CCTV system are as follows:
 - 2.1.1 to ensure the safety of staff, students and visitors;
 - 2.1.2 for the prevention, reduction, detection and investigation of crime and other incidents;
 - 2.1.3 to assist in the investigation of suspected breaches of the School's rules
- 2.2 The school intends to use CCTV for the purposes of:
 - 2.2.1 providing a safe and secure environment for pupils/students, staff and visitors;

- 2.2.2 protecting the School's buildings and assets, both during and after hours;
 - 2.2.3 reducing the incidence of vandalism, bullying, anti-social behaviour and site incursion ;
 - 2.2.4 enabling a faster and more effective resolution to incidents by assisting staff in identifying persons who have committed a breach of the School's rules;
 - 2.2.5 safeguarding students absent from lessons through visible checks about location during the school day and also during breaks;
 - 2.2.6 assisting in the prevention of crime and assisting law enforcement agencies in apprehending offenders
- 2.3 The use of the CCTV system will be conducted in a professional, ethical and legal manner and only for the intended purposes.

3. Overview of the CCTV System

- 3.1 The CCTV system is owned and managed by the St Mary's CE High School. Under current data protection legislation the School is the 'data controller' for the images produced by the CCTV system. Recognisable images captured by CCTV systems are 'personal data'.
- 3.2 The CCTV system operates to meet the requirements of the current data protection legislation and the ICO's guidance.
- 3.3 The CCTV system produces clear images which are suitable for the intended purposes, and which can easily be taken from the system when required.
- 3.4 The system comprises of 160 fixed cameras. The School has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.
- 3.5 Cameras are sited to ensure that they only capture images relevant to the purposes for which they are installed.
- 3.6 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. Care will be taken to ensure that reasonable privacy expectations are not violated.
- 3.7 CCTV is used in various internal and external locations across the school site.
- 3.8 CCTV will not be used in standard classrooms to monitor normal teacher/student classroom activity in school. CCTV is present in IT rooms and will be used to review damage and misuse of the IT equipment after an event has occurred.
- 3.9 CCTV warning signs, as required to be displayed by the Information Commissioners, have been placed at all access routes to areas covered by the school CCTV. The warning signs will be checked on a regular basis and any warning sign destroyed or damaged will be replaced.

4. Monitoring and Recording

- 4.1 The viewing of live CCTV images and recorded images which are stored by the CCTV system will be restricted to authorised staff with the required security access. The images will be viewed on specific computers (Head, Deputy Head, Business Manager and IT Manager) around school and on the CCTV console and screen in the Site Manager's office.
- 4.2 All authorised operators and staff with access to images are aware of the procedures that need to be followed when accessing the recorded images, with permission to view CCTV required from a member of SLT. All staff are aware of the restrictions in relation to access to, and disclosure of, recorded images.

- 4.3 Relevant images may be shared with governing body panels reviewing exclusions, disciplinary matters or complaints.
- 4.4 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 the disclosure of images.
- 4.5 Monitoring and recording of Public Areas may include the following:
 - 4.5.1 the building's perimeter, main entrance/exit gates, lobbies and corridors, storage areas;
 - 4.5.2 restricted access areas at entrances to buildings and other areas;
 - 4.5.3 door controls, external alarms;
 - 4.5.4 parking areas

5. Storage and Retention of Images

- 5.1 The images captured by the CCTV system will be retained for an average maximum of 30 days from the date of recording, except where the image identifies an issue and is required to be retained specifically in the context of an investigation/prosecution of that issue.
- 5.2 The images/recordings will be stored in a secure environment with a log of access kept.
- 5.3 Access will be restricted to authorised personnel only.

6. Disclosure of Images

- 6.1 Requests by individual data subjects for images relating to themselves will be treated as a 'Subject Access Request' and should be submitted in writing to the Data Protection Officer (DPO) together with proof of identification. Further details of this process can be found here <https://st-maryshigh.herts.sch.uk/wp-content/uploads/2021/12/GDPR-SARs-Policy-rev-Summer22.pdf>.
- 6.2 In order to locate the images, sufficient detail must be provided by the data subject in order to allow the relevant images to be located.
- 6.3 Where the School is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.
- 6.4 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. In some circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation. Relevant images may also be shared with governing body panels reviewing exclusions, disciplinary matters or complaints.
- 6.5 All such disclosures will be made at the discretion of the DPO.
- 6.6 A record of any disclosure made under this policy will be held on the CCTV management system, detailing the date, time, camera, requestor, authoriser and reason for the disclosure.

7. Data Protection Impact Assessment

- 7.1 Prior to the installation or repositioning of any CCTV camera, or system, a data protection impact assessment (DPIA) is required to be conducted by the school to ensure that the proposed installation is compliant with legislation and ICO guidance. The assessment will be approved by the DPO.
- 7.2 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.

8. Complaints Procedures

- 8.1 Complaints concerning the School's use of its CCTV system or the disclosure of CCTV images should be made in writing to the Headteacher.

9. Policy and CCTV System Review

- 9.1 This policy is reviewed annually with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.
- 9.2 The School carries out an internal assessment annually to evaluate the usage and effectiveness of the CCTV system.

Document Control

Date modified	Description of modification	Modified by