



St John's C of E Primary Academy

CCTV Policy

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Key Personnel

Executive Principal: Sarah Cockshott

Chair of Governors: Michael Ward

St Johns C of E Primary Academy CCTV Policy

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Review date: January 2023

1 Policy Statement

- 1.1 St Johns C of E Primary Academy uses Close Circuit Television (“**CCTV**”) within the premises of academy. The purpose of this policy is to set out the position of the Local academy committee as to the management, operation and use of the **CCTV** at the St Johns C of E Primary Academy.
- 1.2 This policy applies to all members of our Workforce, visitors to St Johns C of E Primary Academy 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 St Johns C of E Primary Academy in relation to its use of CCTV.

2 Purpose of CCTV

- 2.1 St Johns C of E Primary Academy 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 St Johns C of E Primary Academy 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 16 camera dome system, set at various locations across the academy. The cameras are in fixed positions with no sound recording capabilities.

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. St Johns C of E Primary Academy will make all reasonable efforts to ensure that areas outside of the academy 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.

5 Privacy Impact Assessment

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5.1 Prior to the installation of any **CCTV** camera, or system, a privacy impact assessment will be conducted by St Johns C of E Primary Academy to ensure that the proposed installation is compliant with legislation and ICO guidance.

5.2 St Johns C of E Primary Academy 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 schools Site Manager. On a day to day basis the **CCTV** system will be operated by the schools Site Manager or the admin team.

6.2 The viewing of live **CCTV** images will be restricted to the school's main admin office

6.3 Recorded images which are stored by the **CCTV** system will be restricted to access by the **Executive Principal**.

6.4 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 disclosure of images.

6.5 The **CCTV** system is checked Daily by the Site Manager 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 14 calendar days unless there is a specific purpose for which they are retained for a longer period.

7.3 St Johns C of E Primary Academy 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 St Johns C of E Primary Academy.

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 St Johns C of E Primary Academy Subject Access Request Policy.

8.3 When such a request is made the Executive Principal, Assistant Principal or the Site Manager 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.

8.5 If the footage contains images of other individuals, then the Academy 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

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8.5.2 the other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained

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 considerations as to whether to allow access to those images

8.6.3 the individuals that were permitted to view the images and when

8.6.4 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 Academy 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 Executive Principal, Assistant Principal or the Site Manager 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 Annually

10.2 The **CCTV** system and the privacy impact assessment relating to it will be reviewed 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 Academy should be made in accordance with the Academy Complaints Policy.