



# St Gregory's Catholic Primary School



## CCTV POLICY

# **St Gregory's Catholic Primary School**

## **SCHOOL CLOSED CIRCUIT TELEVISION (CCTV) POLICY**

### **1. Introduction**

1.1 The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at St Gregory's Catholic Primary School, hereafter referred to as 'the School'.

1.2 The system comprises of a total of 9 fixed dome cameras which are located at the main entrance and outdoor areas of the School. The system does not have sound recording capability. All cameras are monitored from a central control point and are only available to selected senior leadership staff.

1.3 This policy follows Data Protection Act 1998 (DPA) and the General Data Protection Regulation (GDPR) and the new Data Protection Act 2018 guidelines.

1.4 The policy will be subject to annual review.

1.5 The CCTV system is owned by the School.

1.6 The system was installed by National Integrated Solutions Ltd on behalf of the School and the School has a maintenance contract with them.

### **2. Objectives of the CCTV scheme:**

- (a) To protect pupils and staff in the School;
- (b) To protect the School buildings and their assets;
- (c) To deter potential criminal offenders;
- (d) To increase personal safety and reduce the fear of crime;
- (d) To assist in identifying, apprehending and prosecuting offenders;
- (e) To protect members of the public and private property;
- (f) To assist in managing the School.

### **3. Statement of intent**

3.1 The CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2016/679.

3.2 The School treats all information, documents and recordings obtained and used as personal data which is protected by the above legislation.

3.3 Cameras will be used to monitor activities within the School grounds to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the pupils, staff and visitors.

3.4 Static cameras do not focus on private homes, gardens and other areas of private property.

3.5 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Copies of incidents will only be released to the media for use in the investigation of a specific crime and with the written authority of the Police.

3.6 The planning and design has endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

3.7 Information signs, as required by the Code of Practice of the Information Commissioner have been placed at various points around the outside of the School.

#### **4. Operation and maintenance of the system**

4.1 The CCTV system is administered and managed by the Data Controller, Mr. D. Darbyshire.

4.2 The CCTV system will be operated 24 hours each day, every day of the year.

4.3 The system for the School was installed by National Integrated Solutions Ltd and is maintained by them.

4.4 Access to the CCTV Controls will be strictly limited to senior leadership staff as nominated by the Data Controller.

#### **5. Monitoring procedures**

5.1 Camera surveillance can be maintained at all times.

5.2 There is one monitor point in the Data Controller's Office.

5.4 When reviewing any CCTV footage no one other than personnel authorised by the Data Controller should be present. All authorised operators are aware of their responsibilities in following the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of recorded images.

#### **6. Recording procedures**

6.1 Any recording required for evidential purposes must be sealed, witnessed, signed by the Data Controller, dated and stored in a separate, secure, evidence bag.

6.2 No one other than authorised personnel should be present when a recording is made, or when an incident is viewed.

6.3 Recordings may be viewed by the Police for the prevention and detection of crime.

6.4 A record will be maintained of the release of recordings to the Police or other authorised applicants.

6.5 Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.

6.6 Should a recording be required as evidence, a copy may be released to the Police under the procedures described in paragraph 6.1. Recordings will only be released to the Police on the clear understanding that it remains the property of the School, and both the recording and information contained on it are to be treated in accordance with this policy. The School also retains the right to refuse permission for the Police to pass to any other person the recording or any part of the information contained within the recording. On occasions when a Court requires the release of an original recording, this will be provided by the School.

6.7 The Police may require the School to make and retain recordings for possible use as evidence in the future. Such recordings will be securely stored until they are needed by the Police.

6.8 Applications received from outside bodies (e.g. solicitors) to view or release recordings will be referred to the Data Controller. In these circumstances recordings will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request (SAR), or in response to a Court Order.

6.9 The retention period for recordings is 28 days unless required under section 6.1 to 6.8 above.

## **7. Breaches of the code (including breaches of security)**

7.1 Any breach of the CCTV policy by school staff will be initially investigated by the Head teacher, in order for him to take any appropriate disciplinary action.

7.2 Any serious breach of the CCTV Policy by school staff will be immediately investigated by the Chair of Governors in accordance with the school's disciplinary procedure.

7.3 Any breach of the CCTV policy by the Head teacher will be investigated by the Chair of Governors in accordance with the school's disciplinary policy.



## **8. Complaints**

8.1 Any complaints about the School's CCTV system should be addressed to the Head teacher of the School.

8.2 Complaints will be investigated in accordance with Section 7 of this policy.

## **9. Rights of the Data Subject**

The list of rights that a data subject (person who the data is about) can exercise has been widened (subject to 6.9 above):

9.1 The right to be informed - via privacy notices.

9.2 The right of access; the timescale in which a subject access request (SAR) can be made has been reduced from 40 calendar days to one calendar month. SARs must be free of charge, charges can only be made for further copies or where requests for information are unfounded or excessive.

9.3 The right of rectification; inaccurate or incomplete data must be rectified within one month.

9.4 The right to erasure; individuals have a right to have their personal data erased and to prevent processing unless we have a legal obligation to do so.

9.5 The right to restrict processing; individuals have the right to suppress processing. We can retain just enough information about the individual to ensure that the restriction is respected in future.

9.6 The right to data portability; we need to provide individuals with their personal data in a structured, commonly used, machine readable form when asked.

9.7 The right to object; individuals can object to their personal data being used for profiling, direct marketing or research purposes.

9.8 Rights in relation to automated decision making and profiling.

## **11. Subject Access Requests.**

11.1 Individuals have the right to request CCTV footage relating to themselves under the data protection legislation (subject to 6.9 above).

11.2 All requests should be made in writing to the Data Protection Officer who can be contacted by email to [sbm@st-gregorys-pri.lancs.sch.uk](mailto:sbm@st-gregorys-pri.lancs.sch.uk). Individuals submitting requests will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location.

11.3 The school will respond to requests within a calendar month but if this request is received outside of school term time or beyond the retention period for the data this may not be possible.

11.4 In any event the school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

## **12. Privacy Impact Assessments.**

12.1 The school will perform a data privacy impact assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and is addressing an identified need.

## **13. Policy Review**

13.1 The Data Protection Officer is responsible for monitoring and reviewing this policy. The policy will be reviewed annually. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

## **10. Public information**

10.1 Copies of this policy will be available to the public from the School website and the School office

Date: 4 <sup>th</sup> February 2019	Proposed Review date: 4 <sup>th</sup> February 2020
Reviewed: September 2020	Proposed review date: September 2021
Reviewed: December 2022	Proposed review date: December 2023
Reviewed: January 2024	Proposed review date: January 2025
Reviewed: June 2025	Proposed review date: June 2026

Mr D Darbyshire

25-06-2025