



## ROYAL LATIN SCHOOL

“High Expectations For All”

### CCTV Policy

<b>Date agreed by the Finance &amp; Premises Committee on behalf of the Governing Body</b>	<b>7th October 2019</b>
<b>Date to be reviewed</b>	<b>October 2022</b>
<b>Governors’ Committee accountable for the review</b>	<b>Finance &amp; Premises</b>
<b>Senior Leadership Team member accountable for review</b>	<b>David Hudson</b>
<b>Date approved by Full Governing Body</b>	<b>14th October 2019</b>

**Signed:.....Name:.....)**  
Chair of the Governors

**Date .....**

Policy Title	<b>CCTV</b>
Date of Issue	<b>7th October 2019</b>

<b>Expected Outcomes</b>
<ul style="list-style-type: none"> <li>• all School staff are aware of how to comply with data protection legislation in relation to the use of CCTV</li> <li>• Staff, students, parents and visitors are confident that CCTV is used in a proportionate and justified way in relation to any potential or perceived risks</li> </ul>
<b>Additional Comments</b> (e.g. Risks identified / Alternatives considered / Costs involved / 'Do nothing' option?)

Date for review	<b>October 2022</b>

<b>Outcomes (with evidence)</b>
<b>Additional Comments</b> (include any recommendations)

## 1 Introduction

- 1.1 This policy sets out how The Royal Latin School (the **School**) will manage the operation and use of CCTV.
- 1.2 The purposes of this policy are:
  - 1.2.1 to help the School to regulate and manage its use of CCTV;
  - 1.2.2 to help the School be transparent about how the School uses CCTV;
  - 1.2.3 to help ensure that the use of CCTV remains a proportionate and justified response to the problems that it seeks to address; and
  - 1.2.4 to provide guidance for all School staff on how to comply with data protection legislation in relation to the use of CCTV.
- 1.3 This policy is aimed at members of staff and is available to students, parents and visitors on request on the School website and from the School office.

## 2 The use of CCTV

- 2.1 The School's CCTV system comprises a number of cameras located on the School premises.
- 2.2 The School uses CCTV for the following purposes:
  - 2.2.1 to safeguard the welfare of students, staff and visitors;
  - 2.2.2 to protect the School, students, parents, staff and visitors from criminal activity such as theft and vandalism;
  - 2.2.3 to increase personal safety;
  - 2.2.4 to support the protection of property;
  - 2.2.5 to aid in the investigation of accidents and incidents and the monitoring of health and safety; and
  - 2.2.6 to support law enforcement agencies in the reduction, prevention and detection of crime and to assist in the identification, apprehension and potentially prosecution of offenders.
- 2.3 CCTV footage may contain the personal information of those individuals captured by the recording.

## 3 Governance

- 3.1 The Premises Manager has overall responsibility for the management and operation of the CCTV and the implementation of this policy.
- 3.2 The Premises Manager will ensure that the CCTV system is operated according to this policy and that annual audits are carried out to ensure that the relevant procedures are complied with.

## 4 Minimising privacy risks

- 4.1 The School has carried out a Data Protection Impact Assessment on the use of CCTV. The outcome of the assessment was that the use of CCTV is a necessary and proportionate

measure to achieve the purposes listed at 2.1 above provided that certain measures are put in place to mitigate the risks.

- 4.2 The School appreciates that the use of CCTV impacts on individuals' privacy but considers this intrusion to be justified because less privacy intrusive methods would not be sufficient to meet the School's purposes for using CCTV. In coming to this conclusion, the School has had particular regard to the safeguarding and welfare duties it owes to students.
- 4.3 The School reviews the Data Protection Impact Assessment on an annual basis to ensure that the use of CCTV continues to be justified and that the appropriate measures are in place to mitigate the data protection risks raised by its use.
- 4.4 The School will also review its use of CCTV should a concern be raised about its practices.

## 5 **The operation of CCTV**

- 5.1 The School has sited the cameras to view only areas which need to be monitored, for example, they do not monitor neighbouring private residences.
- 5.2 Where CCTV cameras are placed on the School premises, we will display signs to alert individuals that their image may be recorded. Such signs will identify the School as the organisation operating the system, identify the purpose for using the surveillance system and who to contact for further information, where these things are not obvious to those being monitored.
- 5.3 CCTV is not used in areas where individuals will have a heightened expectation of privacy, for example, there are no cameras in toilets or changing rooms.
- 5.4 The cameras have been positioned in a way to ensure their security and to protect them from vandalism.
- 5.5 The School has ensured that the cameras can produce images of the necessary clarity and quality to meet the School's purposes. The school is undertaking a program to update the cameras as funding becomes available to improve the images produced.
- 5.6 Images can be extracted from the system if required, for example, under a disclosure to law enforcement agencies and or under a subject access request (please see section 11 for more information on subject access requests). The School is able to obscure parts of the images where required to protect the identity of individuals.
- 5.7 The CCTV does not capture sound recordings.
- 5.8 The CCTV cameras are in operation 24 hours a day every day of the year because this is necessary to meet the purposes for which they were installed including detecting intruders and safeguarding our students.
- 5.9 The School is solely responsible for the operation of all CCTV in accordance with this policy for the purposes identified at section 2.1 above.
- 5.10 We will never engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place) unless, in highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or equivalent serious malpractice is taking place and, after suitable consideration, we reasonably believe there is no less intrusive way to tackle the issue.
- 5.11 In the unlikely event that covert monitoring is considered to be justified, the School will carry out a Data Protection Impact Assessment (please see section 4 above for more information).

The rights of individuals whose images may be captured will always be taken into account in reaching any such decision.

## 6 Maintenance of the CCTV equipment

- 6.1 The Network Manager will check on a monthly basis that the system is operating effectively and in particular that the equipment is recording properly and that cameras are functional. Any software updates will be applied by the Network Manager.
- 6.2 The system will be regularly serviced and maintained to ensure that clear images are recorded. If any defects are found these will be reported to the Premises Manager or Network Manager for rectification.
- 6.3 The School will monitor the operation of the CCTV system by investigating any notifications or concerns regarding the functionality of the CCTV system.

## 7 Storage and security

- 7.1 The CCTV footage will be stored securely and will only be accessed by designated School staff, these being the Headteacher and members of the Senior Leadership Team, the Head of Sixth Form, The Premises Manager, the IT team, the Head Caretaker, The Key Stage Student Support Team Leader and the Student Reception Team (**Designated Staff**). Other staff may view the CCTV footage as and when required in exceptional circumstances with the permission of the Designated Staff. Designated Staff will be given additional training on CCTV, as appropriate.
- 7.2 CCTV recordings, including any copies made, are encrypted. The School will also encrypt any copy before it is shared with a third party (such as a law enforcement agency) unless there is a good reason for not doing so.
- 7.3 The Designated Staff are trained in the School's security procedures. The Designated Staff will ensure that camera footage is not accessed by any unauthorised person.
- 7.4 The only locations where CCTV footage can be viewed are in selected private and secure offices. The monitors which live stream the CCTV footage are held in a secure area. CCTV viewable on password protected computers.
- 7.5 Only Designated Staff are authorised to make copies (electronic or paper) of the CCTV footage. All electronic copies must be stored in the CCTV Google team drive.
- 7.6 Only the Designated Staff may allow external persons or agencies to view the CCTV footage and this will be done in accordance with section 12 below.
- 7.7 Any information security breach (for example, any unauthorised access to CCTV footage) must be reported immediately to a Data Protection Lead in accordance with the School's Records Management Policy.
- 7.8 All maintenance of ICT or CCTV equipment which could provide access to CCTV footage will only be carried out by the Designated Staff or authorised contractors.
- 7.9 Staff should note that any misuse of the CCTV system might constitute a criminal offence, for example, accessing footage without authorisation from Designated Staff.
- 7.10 Where footage is saved following an incident this will be done securely in the CCTV Google Team drive.

## **8 Internal use of the CCTV**

- 8.1 If a member of staff considers that CCTV footage might be needed for an internal matter (e.g. a pupil disciplinary issue) they should speak to the Premises Manager in the first instance.

## **9 Retention**

- 9.1 Compliance with data protection law means that the School does not retain personal data for longer than is required for the purposes for which it was obtained. Recorded images will normally be retained for one month from the date of recording in accordance with the School's Records Management Policy.
- 9.2 However, the School has procedures in place to retain information for a longer period if this is required. For example, where an incident caught by the CCTV footage is being investigated or where there has been a subject access request.
- 9.3 The School may permanently delete images after a shorter period, for example where it can be determined more quickly that there has been no incident giving rise to the need to retain the recorded images.
- 9.4 The School has procedures in place to ensure that information is disposed of securely. The system automatically deletes data after 30 days. Saved recordings and pictures will be disposed of after 30 days or when they are no longer required (if longer). This is the responsibility of the Premises Manager.

## **10 Informing individuals about the use of CCTV**

- 10.1 The School appreciates the importance of being open and transparent about the use of CCTV. This policy published on the School's website and is available on request from the School office.
- 10.2 The School's privacy notices for staff, parents and students include information about the use of CCTV by the School including for what purpose it is used. A copy of the privacy notices can be found [here](#).
- 10.3 There are prominently displayed signs in areas where CCTV is in operation (for example, at all access routes into and out of the School).

## **11 Subject access requests**

- 11.1 Under data protection legislation individuals have the right to access information about themselves which may include images of them in CCTV footage.
- 11.2 In order for us to locate relevant footage, any requests for copies of recorded CCTV images should include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.
- 11.3 We reserve the right to obscure images of third parties when disclosing CCTV data as part of a subject access request, where we consider it necessary to do so.
- 11.4 Members of staff have been trained to recognise subject access requests and understand that such a request may cover CCTV footage. Staff must refer all subject access requests to the Headteacher immediately because such requests are complex and there is a statutory timeframe for the School's response.

## **12 Disclosure to law enforcement agencies**

- 12.1 Images from the CCTV system may be disclosed to law enforcement agencies (e.g. the Police) where the School considers such disclosure necessary (for example, for the prevention and detection of crime). However, any such disclosure will only be in accordance with data protection law.
- 12.2 Requests from law enforcement agencies should be referred to the Premises Manager.
- 12.3 If CCTV footage is disclosed to a law enforcement agency the School will record what information has been disclosed, when the disclosure was made, to whom the information was disclosed and for what purpose(s). The School has a register containing details of all disclosures of CCTV footage. The law enforcement agency should produce a written request using the appropriate form to support its request for disclosure. The School should keep a copy of this on file as well.
- 12.4 The School will ensure that the disclosure of CCTV footage is carried out securely. The precise method of communication will be determined by the Headteacher but encrypting the footage will be considered.
- 12.5 If law enforcement agencies require the School to retain the stored CCTV footage for possible use as evidence in the future the information will be indexed and securely stored until it is needed.

## **13 Other requests for information**

- 13.1 CCTV footage may be disclosed in other circumstances if this is in accordance with data protection legislation. For example, if required by a court order or if in connection with legal proceedings.
- 13.2 Applications received from outside bodies (e.g. solicitors) to view footage must be referred by staff to the Headteacher.
- 13.3 CCTV footage will not be made available to the media for commercial or entertainment purposes.
- 13.4 We will maintain a record of all disclosures of CCTV footage.

## **14 Breaches of this policy**

- 14.1 If staff consider that this policy is not being followed in any respect, they must inform the Business Manager immediately.
- 14.2 Any breach of this policy by a member of staff will be taken seriously and will be investigated by the Business Manager, or another senior member of staff nominated by the Headteacher, and may result in disciplinary action.

## **15 Legal basis for processing**

- 15.1 Under data protection law the School must set out the bases it is relying on to make and use CCTV footage.
- 15.2 The School considers that the following bases are applicable:
  - 15.2.1 The School has a legitimate interest in using CCTV for the purposes described at paragraph 2.2 above. In addition, others, such as students, parents, and visitors to the School site, also have a legitimate interest in the School's use of CCTV (e.g. so that they are confident that the School site is safe). The use of CCTV is not unfair

because the School has put measures in place to safeguard the rights of individuals identifiable from CCTV, as described in this policy. The School considers that the use of CCTV is necessary for the purposes described at paragraph 2.2.

15.2.2 The use of CCTV for the purposes described in paragraph 2.2 is also in the public interest .

15.2.3 Sometimes the School's use of CCTV will be necessary for compliance with a legal obligation, for example, where it is required to disclose a CCTV recording to the Police in accordance with a court order.

15.3 There may be other bases depending on the circumstances.

## 16 **Complaints**

16.1 Any complaints or concerns about the use of CCTV by the School should be addressed to the Headteacher in accordance with the School's Complaints Policy which can be found via the School's website.

**Appendix 1:**

This policy has been read and understood by the following Designated Staff;

<b>Name</b>	<b>Job Title</b>	<b>Signature</b>
David Hudson	Headteacher	
Marcella McCarthy	Deputy Head	
Michelle Taylor	Assistant Head	
Iain Wilson	Assistant Head	
Debbie Payton	Assistant Head	
George West	Assistant Head	
Rebecca Wilson	Business Manager	
Jason Skyrme	Associate Assistant Head	
Martin Farrell	Associate Assistant Head	
Nicola King	Premises Manager	
Sam Ford	Network Manager	
Neil Stafford	Head Caretaker	
Claire Weight	Lead KS Student Support	
Dorian Severs	IT Systems Administrator	
Roderic Stewart	IT Systems Administrator	
Chris Lowery	Receptionist	
Debbie Price	Receptionist	
Patty Goddard	Librarian	
Michelle Dykes	Library Assistant	
Yvonne Field	6th Form Study Supervisor	
Nicky Gahagan	Head of Year 11	

Carly Flanagan	Head of Year 10	
Jodie Davison	Head of Year 8	