



*Saint Joseph's*  
CATHOLIC SCHOOL

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# **CCTV Policy**

Version 2.0 June 2023

ST JOSEPH'S CATHOLIC SCHOOL  
CHURCH ROAD  
LAVERSTOCK  
SALISBURY  
SP1 1QY

<b>Success Criteria:</b>			
Providing a safe environment for all pupils, staff, and visitors and to prevent criminal activity on the school premises.			
<b>Context/Aim:</b>			
This document sets out the appropriate actions and procedures, which must be followed to comply with the Data protection Act in respect of the use of CCTV (close circuit television) surveillance systems managed by St Joseph's Catholic School in support of the above.			
<b>Monitoring Procedures:</b>			
<b>By Whom:</b> Governors' Finance & Premises Committee	<b>When:</b> Biennially	<b>How:</b> Reports to the Governors' Finance & Premises Committee	
<b>Evaluation:</b>			
<b>By Whom:</b> School Business Manager and the Governors' F&P Committee	<b>When:</b> Biennially	<b>How:</b> School Business Manager to provide reports to F&P committee	
<b>Revision History:</b>			
<b>Version</b>	<b>Approved</b>	<b>Review Date</b>	<b>Additional notes</b>
V2.0	June 2023	June 2025	Re-Write
V 1.3	June 2021	June 2023	
V 1.2	June 2019	June 2021	GDPR compliant
V 1.1	November 2016	November 2017	-
V 1.0	October 2014	December 2016	Re-write
<b>Key Personnel:</b>			
School business manager	To ensure policy is adhered to and staff are trained accordingly		
Network manager	To manage technical aspects of CCTV system with assistance from Premier Fire & Security		
<b>Vision Statement:</b>			
<p>St Joseph's is a co-educational, 11-16 Catholic voluntary-aided school in the diocese of Clifton and the county of Wiltshire. Our aim is to provide a caring educational environment where each person is valued and is given the dignity due to a child of God.</p> <p>At the heart of our school is the Christian vision of the human person. We want each member of our community to grow as an individual witness to the gospel values of love, truth and justice. We want each pupil to be healthy in mind, body and spirit.</p> <p>Each member of our community should feel safe and secure in the learning environment. We aim to develop a sense of self-discipline and responsibility in our pupils. Everyone in our community should show respect for themselves, respect for others and respect for the environment.</p> <p>We believe that each pupil should have the opportunity to enjoy and achieve to their full potential. We are committed to praising and celebrating achievement. We want our pupils to have high expectations of themselves to understand the value of service to others and our responsibility as stewards of the environment. Everyone has a contribution to make in helping to build the common good. We aim to equip our pupils with the ability to make good choices in their lives based on the positive relationships and values they have learned in St Joseph's.</p> <p>We aim to help each of our pupils to develop morally and spiritually. We want them to achieve economic well-being while being mindful of the needs of others who are less fortunate.</p> <p>We are committed to aspiring for excellence in all that we do for the sake of the Gospel.</p> <p>Headmaster</p>			

<b>National Policies and guidance/courses referred to and incorporated into SJCS Policy:</b>	
<b>Document/Course Title:</b>	<b>Document/Course Date:</b>
CCTV Code of Practice – ICO 2208	

<b>Other SJCS Policies that relate to this Policy:</b>
Data Protection Policy
Behaviour Policy
Staff Code of Conduct Policy

# CCTV Policy

## Statement

The CCTV system includes 28 static and remotely operated cameras and is used for the purpose of:

- The prevention, detection and investigation of criminal activity;
- Security of the premises;
- Preventing loss or damage to school property;
- Providing a safe and secure environment for pupils, staff and visitors.

The CCTV system is registered with the Information Commissioner. The school has a register of all cameras and their location.

### Responsible Persons:

The system is installed and maintained by Premier Fire and Security. Schoolcare (IT providers) have been appointed to oversee the system. The school business manager is responsible for overseeing the policy and procedures together with the Finance & Premises committee.

### Who is included in these arrangements?

This policy applies to anyone working or applying for a position with St Joseph's Catholic School.

Volunteers to the school should be made aware that CCTV monitoring takes place and that information may be passed to the police where criminal activity is suspected or a criminal matter arises.

Agency staff and contractors should be made aware of the policy and that CCTV evidence and vehicle tracking, where applicable may be discussed with their employer or passed to the police should a disciplinary or criminal matter arise.

### **What are the main points?**

Cameras are installed in school buildings for preventing and detecting crime or acts of misconduct and for health and safety reasons. The school/academy will ensure that all cameras are set up in a way that makes sure that there is minimal intrusion of staff privacy and that any intrusion is fully justified.

Signs will be displayed to inform staff and visitors that CCTV is in use and its purpose. This ensures that staff are fully aware that they are potentially subject to surveillance and can take appropriate steps to limit the impact of the CCTV with regard to their privacy.

### **Where CCTV is installed**

Apart from car parks, many of the locations have stand-alone systems installed. They will generally cover entrances, exits and external areas; however, in some cases they will also cover public or communal areas. The CCTV cameras are not continuously monitored, and the CCTV cameras record images only and not sound.

When new CCTV monitoring is installed, all affected staff will be fully informed, ensuring that they have information about the purpose of the monitoring and how the information will be used

### **Viewing and recording of images:**

- Signs are displayed to notify all users that CCTV is in operation.
- CCTV is available on computers in the following areas:  
School business manager's office, IT support office, site manager's office, senior leaders' office and SLT offices.
- The images that are recorded are held in a secure location and can only be accessed by those who are authorised to do so (SLT folder) Once investigations are complete, the file is deleted after a maximum of one year.
- Recordings are disposed of on an annual basis or when the policy is reviewed by the school business manager (biennially).
- Digital media is used to record images.
- The system has been set up to provide good quality images.
- Every camera records simultaneously and the images are stored for a minimum period of 30 days. After that time all images are erased apart from any which relate to an incident subject to an on-going investigation.
- A record is kept of all images viewed/recorded in SLT/CCTV folder.
- Routine checks are made by schoolcare to ensure that the system is operating in accordance with the terms of this policy, and that information relating to the recordings (date, time etc.) are accurate; these details are entered into the CCTV.

## Use and disclosure of images:

Viewing and access to images is strictly controlled and limited to the following staff:

- Schoolcare staff onsite
- SLT
- Heads of House (supervised)
- Site manager

Procedures for managing the saved data is detailed in the **CCTV use and disclosure of images protocol** – staff are trained to understand the administrative regime to control the use of the images.

## Access by individuals:

The school recognises the rights of staff, students and visitors to the school to make a subject access request for details of personal data held, in line with the Data Protection Act a 2018. Permission will only be granted subject to obtaining consent from any other individuals present in the footage:

- Applications should preferably be made in writing to the school business manager.
- A response must be provided within 1 month

## Evidence from CCTV footage

CCTV evidence can be used where the school is able to show that it is acting fairly and lawfully. CCTV recordings will only be accessed where the school has a reasonable belief that there is suspected criminal activity, gross misconduct, health and safety issues or to protect the school against fraudulent damage claims, or when a police crime reference number has been issued or CCTV footage discloses activities that they could not reasonably be expected to ignore.

Use of CCTV data will only be considered as evidence following consultation with the school HR adviser, in order to establish whether it is an essential part of the investigation.

Retrieval of CCTV images of the school buildings is strictly limited to members of the senior leadership team, Site Manager, and as necessary, by the Chair of Governors.

Requests to view CCTV data of the school/academy buildings should be made to the Headteacher.

Where CCTV evidence forms part of a disciplinary case the staff member will be shown a copy of the images and given the opportunity to respond to them as part of the disciplinary process. Images of other persons in the CCTV footage must be edited out e.g. by redaction or pixilation unless consent for the images to be released has been obtained from the persons concerned.

The CCTV footage will only be disclosed to those staff members and relevant parties who need access to it and require sight of the footage as part of the disciplinary process.

Where CCTV exonerates the member of staff of any wrong doing, the images will only be retained until the matter is concluded and the school/academy feels it is no longer necessary to retain the images.

Where there is evidence of criminal activity, recordings may be provided to the police or other enforcement agencies, if requested. Any such disclosure would be made in accordance with the Data Protection Act.

### **Storage of CCTV footage**

Images from CCTV footage will be securely stored and only authorised personnel will have access to them. The images will be retained for the designated time of their system after which they will be automatically overwritten. (Typically 7–30 days).

In an investigation, in accordance with data protection principles, images will only be retained long enough for the incident to be investigated and concluded in respect of the School's internal processes and/or at the end of any legal or other process which requires the data to be retained. The Information Commissioners Office in part 3 of its ICO Employment Practices code has information on data protection.

### **Covert CCTV Monitoring**

Covert CCTV monitoring is when CCTV monitoring takes place but those subject to it are unaware that it is happening. For this reason, the use of covert CCTV will not normally be considered. It will only be justified in limited circumstances where there is reasonable suspicion that a crime or serious misconduct is taking place and where CCTV use is likely to be a proportionate means of securing evidence.

The school will comply with the relevant provisions in the ICO Employment Practices code including:

- A privacy impact assessment will be completed by the Headteacher to consider whether the proposed surveillance can be justified as proportionate to the needs identified.
- Consultation is also a key element of this process. The Headteacher may discuss with another member of the SLT and/or the chair of governors.
- Ensuring that any covert monitoring is strictly targeted and limited in scope and time.
- Limiting the number of people involved in the investigation.
- Prior to the investigation setting up clear rules limiting the disclosure and access to any information obtained.

Where covert monitoring is being considered, advice must be sought in advance from the school's HR Advisor. They will consider whether there is an alternative more suitable solution.

In some cases, covert CCTV monitoring installed for one investigation may reveal evidence of other criminal behaviour or disciplinary offences. The footage will only be used where the offence is criminal activity, gross misconduct, putting others at risk or reveals activities that a Headteacher could not reasonably be expected to ignore.

CCTV will not be operated in toilets or changing rooms, unless this is necessary for the investigation of a serious crime, or there are circumstances in which there is a serious risk to health and safety or to the operation of the school's business. The only time where CCTV will be operated in these places is where covert CCTV monitoring is justified and only where it is a proportionate means of achieving the aim in question.

All covert CCTV monitoring equipment will be removed once the investigation is complete.

### **Employee responsibilities**

Ensure that employees are aware and understand the policy.

### **Headteacher responsibilities**

Ensure staff are aware where CCTV or tracking devices are in operation.

When new methods of CCTV monitoring or tracking are introduced, ensure staff are fully informed and they have information about the purpose of the monitoring and how the information will be used.

Ensure, where appropriate, that a privacy impact assessment has been carried out prior to implementation of new monitoring systems.

Regularly remind staff that CCTV or tracking devices are in operation.

When intending to use recorded data for disciplinary purposes ensure that advice has been sought from your HR adviser as to whether this is appropriate and required.

Ensure clear records are kept showing when data has been viewed and for what purpose. These records will be checked termly and the book signed and dated accordingly by the School Business Manager.

Ensure data protection principles and the general data protection regulations (GDPR) are followed and that CCTV recordings and vehicle tracking data are only disclosed to the people who need to have access to them.

## **Appendices**

- Appendix 1: CCTV camera register

## APPENDIX 1: REGISTER OF CCTV CAMERAS

Areas on the school campus covered by installed surveillance CCTV, whether active or not. (At least this should include all outside areas on the school grounds, all entrances, all internal communal areas and all teaching units, individually stated where possible. Total number of possible operative cameras should be included.)

CAMERA AREA	No.		CAMERA AREA	No.
Corridor by garden area	1		Pastoral corridor	17
Inside back door	2		First Floor corridor St Isidor	18
Outside back of science	3		Playground	19
Outside back door	4		Science Quad	20
PE corridor	5		Science corridor R6,7,8	21
Outside back of science	6		Service Road	22
Steps leading to field	7		Staff Carpark Isidor	23
Outside- mobiles	8		Service road/ bin area	24
Inside reception	9		Field next to Isidor	25
Outside – front entrance	10		Boys PE toilet sink area	26
Field view from outside art/Class walkway	11		Girls PE toilet sink area	27
Science/Staffroom corridor	12		2 <sup>nd</sup> Floor Lobby	28
Inside –steps to green area	13		Not in use	29
Playground outside chapel	14		Not in use	30
Entrance corridor St Isidore	15		Not in use	31
Bike shed by Isidor	16			

28 cameras in operation