

# St Charles Catholic Primary School



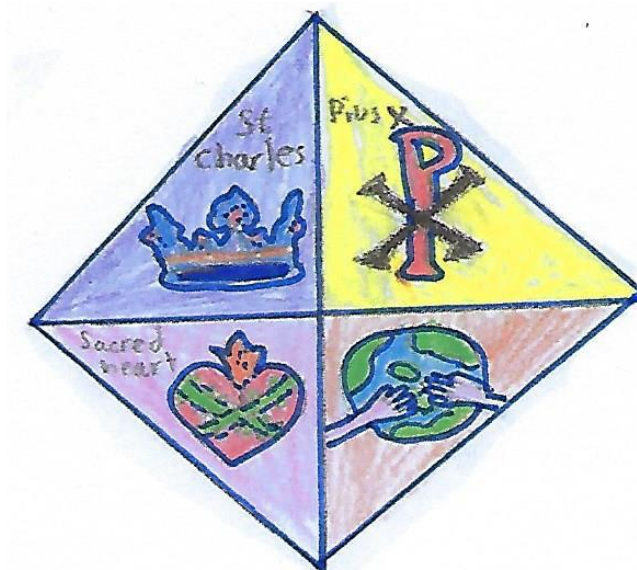
# CCTV Policy

**Date policy adopted: Autumn 2024**

**Reviewed date: Autumn 2026**

# Our Mission Statement

✠ *Love God, Love your Neighbour* ✠



*(Design by Claudia 5A - 2020)*

*Through God's love, and with guidance from the Holy Spirit, we, the Community of St Charles, share our Catholic faith together. We seek to nurture in our children an understanding of the importance of Christian values and a deep love and lifelong commitment to God.*

*We value the unique strengths and gifts of the children entrusted to us and strive to provide an excellent education, so that through our teaching the children may realise their full potential.*

*In partnership with our families, Governors and Parish, and inspired by our faith, we support the children of St Charles. We encourage them to shine, to have pride in their achievements, to show concern for others and contribute to society as responsible citizens.*

## **Our Aims**

- *To appreciate that we are all uniquely created and loved by God.*
  - *To deepen each child's understanding of the Catholic faith.*
- *To nurture in the children an understanding of Christian values and how these help shape our lives and the lives of others.*
  - *To understand the importance of forgiveness and reconciliation.*
- *To work in partnership with parents and Parish to create a Christian atmosphere enriched through prayer.*
  - *To provide an excellent education so children learn and achieve their potential.*
  - *To respect and care for one another in a happy, welcoming and nurturing community.*
  - *To ensure children care and respect others, develop an understanding of the world and contribute to society as responsible citizens.*

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## 1. Mission Statement

## 2. Data Protection:

Any personal data processed in the delivery of this policy will be processed in accordance with the school Data Protection Policy. Further information can also be found in the Record of Data Processing.

## 3. Policy Statement

St Charles Catholic Primary School uses Closed Circuit Television (“CCTV”) within the premises of the school. The purpose of this policy is to set out the operation, use, storage and disclosure of CCTV at the School.

This policy applies to all data subjects whose image may be captured by the CCTV system. It works in concurrence with the School’s Data Protection Policy, Record of Data Processing and Data Retention Schedule.

The policy considers applicable legislation and guidance, including but not limited to;

- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act (DPA) 2018
- Video Surveillance Code of practice as produced by the Information Commissioner’s Office (ICO)
- Protection of Freedom Act (PoFA) 2012
- Human Rights Act 1998.

The CCTV system is owned and operated by the school. The deployment is determined by the Senior Leadership Team, with input from the Board of Governors and Data Protection Officer (DPO).

The school will:

- Notify the ICO of its use of CCTV as part of its registration.
- Complete a Data Privacy Impact Assessment if amendments are to be made to the deployment or use of CCTV.
- Treat the system and all information processed on the CCTV system as data which is processed under DPA 2018/GDPR.
- Not direct cameras outside of school grounds onto private property, an individual, their property or a specific group of individuals. The exception to this would be if authorization was obtained for Direct Surveillance as set up by the Regulatory of Investigatory Powers Act 2000.
- Display warning signs clearly in prominent places.

Specifically, at all external entrances of the school site where CCTV is use and covers external areas. These signs will include information on how to contact the school regarding information or access to the CCTV footage.

- Not use CCTV footage for any commercial purposes.

There is no guarantee that this system will or can cover and detect every single incident taking place in the areas of coverage.

#### **4. Camera Setup**

The CCTV system is comprised of 8 cameras which record day and night covering the external areas of the School. Their coverage does not extends past the school boundaries to public areas.

Cameras will be placed so they only capture images relevant for the purposes for which they are installed, and all care will be taken to ensure that reasonable privacy expectations are not violated.

CCTV is not sited in classrooms except in exceptional circumstances.

Members of staff on request can access details of CCTV camera locations.

#### **5. Purpose of CCTV**

The School uses CCTV for the following purposes:

- To provide a safe and secure environment for school staff, pupils and visitors.
- To protect the school buildings and assets.
- To assist in the prevention and detection of criminal activity.
- To assist law enforcement agencies in apprehending suspected offenders.

#### **6. Covert Monitoring**

The school retains the right in exceptional circumstances to set up covert monitoring. For example:

- Where there is good cause to suspect illegal or serious unauthorised action(s) are taking place, or where there are grounds to suspect serious misconduct.
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from the Head Teacher and Chair of Governors.

Covert monitoring will cease following the completion of any investigation.

#### **7. Storage and Retention**

Recorded data will not be retained for longer than is necessary. While retained the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of people who images have been recorded.

All data will be stored securely.

The monitor to view CCTV footage will be kept in the site manager's office.

Recordings will be kept for 17 days. Where there has been a serious issue, a copy of the relevant footage will be kept for a maximum of 6 months after the resolution of the incident, in line with the school's data retention policy. These will be stored in the site manager's office.

Recordings are kept digitally on a flash drive. They are only accessible by the site manager.

## **8. Access to CCTV Images**

The ability to view live and historical CCTV footage is only to be provided at designated locations and by authorised persons.

Specific live monitoring is limited to office staff and senior leaders.

Direct access to recorded footage is limited to site manager and senior leaders

**Only in exceptional circumstances will any other individuals be allowed to view footage. The reasons for and details of these circumstances will be recorded at the time such a decision is made.**

## **9. Disclosure of Images to Data Subjects (Subject Access Requests)**

Any individual recorded in any CCTV image is considered a data subject and therefore has the right to request access to those images.

These requests will be considered a Subject Access Request and should follow the school's Subject Access Request process.

A subject access request should be made in writing to the Data Protection Lead (Marilyn Troyano ([info@st-charles.rbkc.sch.uk](mailto:info@st-charles.rbkc.sch.uk); tel: 020 8969 5566)).

The person making the request should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested

When such a request is made, the footage will be reviewed in accordance with the request.

If the footage contains only the data subject making the request, then the individual may be permitted to view the footage.

This will be strictly limited to the footage of the data subject making the request and the specific reason for the request.

If the footage contains images of other data subjects, then the school will consider whether;

- The request requires the disclosure of the images of data subjects other than the requester, and whether these additional data subjects can be anonymized in the footage.
- The other individuals in the footage have consented to the disclosure of the images or if their consent could be obtained.
- If not, then whether it is reasonable in the circumstances to disclose those images to the data subject making the request.

The School reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other data subjects or jeopardise an ongoing investigation.

## **10. Disclosure of Images to Third Parties**

The School will only disclose record CCTV footage to third parties where there is a lawful basis to do so.

Third parties acting on behalf of a data subject will be handled in accordance with the usual Subject Access Request process.

CCTV footage will only be disclosed to law enforcement agencies in line with the purpose for which the CCTV system is in place.

If a request is received from a law enforcement agency for the disclosure of footage then the school will ask for an explanation of the reasoning for wanting to obtain the footage. This will give help enable proper consideration of the extent of what can appropriately be disclosed.

If an order is granted by a court for the disclosure of CCTV images then this will be complied with, but consideration will be given to exactly what the order requires.

In all instances, if there are any concerns as to what should or should not be disclosed then the Data Protection Officer will be contacted and further legal advice sought if necessary.

## **11. Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with the school in the first instance.

If you remain unhappy you may wish to contact our Data Protection Officer - David Coy ([david.coy@london.anglican.org](mailto:david.coy@london.anglican.org); Tel: 07903 506531).

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## **12.**