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## CCTV Policy

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### Policy history:

<b>Approved by:</b>	<b>Recourse &amp; Personnel</b>	<b>Date: Lent Term 2025</b>	
<b>Last reviewed on:</b>	<b>Lent term 2021</b>	<b>Next review due:</b>	<b>Lent term 2028</b>
<b>Version</b>	<b>6. Based on Judicium Policy – Jan 2025</b>		

## 1. Philosophy

“At St. Paul’s Catholic School we recognise the right of every individual to be safe at all times and accept the responsibility of ensuring that we never cause a person to feel unsafe by our actions or by our failure to act”

## 2. Purpose of the policy

The purpose of the CCTV system is to assist the school in reaching the following objectives:

- (a) To protect pupils, staff and visitors against harm to their person and/or property;
- (b) To increase a sense of personal safety and reduce the fear of crime;
- (c) To protect the school buildings and assets;
- (d) To support the police in preventing and detecting crime;
- (e) To assist in identifying, apprehending and prosecuting offenders;
- (f) To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence; and
- (g) To assist in managing the school.

The policy regulates the management, operation and use of the CCTV system (closed circuit television) at the school. The CCTV system used by the school comprises of:

Location	Sound
A-Block Main Entrance	Yes
A-Block Front	Yes
A Student Entrance	Yes
A-Block Ground 1 (Internal) RE	Yes
A-Block Rear A139	Yes
B-Block First Middle looking at B201	Yes
A Stairwell down between A & B	Yes
A Stairwell up between A & B	Yes
A Reception Inside	Yes
A-Block Ground 2 Internal Library	Yes
B-Block First looking at MFL office	Yes
B-Block stairs 1 looks at B203	Yes
B-Block stairs 2 looks at B212	Yes
A-Block Frontage Outside school	Yes
B-Block Central area outside B101	Yes
B Carpark Gates B-Block furthest out	Yes
B Side car park looking at MUGA C/D-Block	Yes

B-Block Rear Gates looking at Entrance Gates	Yes
B Central by Toilets looking E-Block	Yes
B-Block Frontage Middle looking at pupil entrance and car park	Yes
B MUGA1 corner of C/D-Block looking at B-Block Car park	Yes
B MUGA2 corner of C/D block looking at the courts towards S-Block	Yes
J-Block frontage 2 looking towards P-Block	Yes
J-Block cycle sheds looking down towards E-Block	Yes
J-Block frontage 1 outside J101 looking towards F-Block	Yes
J-Block Middle Corridor looking towards J103	Yes
J-Block Main lobby looking outside J101 office/toilets	Yes
J-Block Ground stairs outside J108	Yes
K Car Park 2 looking towards MGR and car park	Yes
K Church car park 1 looking at main entrance gates	Yes
K-Block side gate student entrance	Yes
K-block frontage bus lane outside of school	Yes
K Church car park 3 back end of MGR showing car park	Yes
K-block fence K rear looking at EM centre	Yes
K Old Chapel side gate backend of A-Block corner side gate	Yes
K-Block Square looking at Y12 Food Hut	Yes
K-Block Entrance looking at bottom end of K-block outside	Yes
K Food hut K-block Y13	Yes
H-Block side by library looking at A139 office	Yes
G-Block Frontage	Yes
H-Block frontage	Yes
F-Block Ramps looking at G & H	Yes
K-Block right middle looking at K117 internal	Yes
K-Block right front looking at K124 and MG internal	Yes
K-Block right rear looking down from MG internal	Yes
K-Block left middle looking down passageway science side internal	Yes
K-Block left front looking up Art corridor internal	Yes
K-Block left rear outside K107 looking down corridor internal	Yes
EC Block entrance lobby looking at main door internal	Yes
EC Block Playground area looking at the MGR	Yes
EC Block main entrance	Yes
F-Block front 2 looking at H-Block	Yes
F-Block front 1 looking at Library	Yes
P Toilet Entrance P-Block	Yes
P Boys Toilets 1 main entrance P-Block internal	Yes

P Boys toilets stairs P-Block internal	Yes
P Boys toilets 3 looking at sinks internal	Yes
P Boys toilets 2 looking toward back of toilet internal	Yes
S Toilet Block looking at P-Block	Yes
S Canteen Front looking at S / C/D Block	Yes
S Canteen Rear looking at Metal Containers	Yes
S Workshop	Yes
S Canteen front 2 looking at big fridge	Yes
S-Block rear corner looking at J-Block and I	Yes
S Rear canteen floor area internal Yr7	Yes
S Ball courts 1	Yes
S Ball courts 2	Yes
S Front Canteen servery internal	Yes
S Rear roadway Canteen MUGA and C/D BLock	Yes
S Rear Canteen servery internal	Yes
S Front canteen floor internal	Yes
S-Block rear courts area	Yes
S MUGA and Courts	Yes

All cameras are Dahua, each have 28days + recording capacity and they are all fixed, not swivel.

Some of our CCTV camera's audio record, as detailed above. We understand that audio recording CCTV is seen as highly intrusive. Therefore, we have the function to turn off audio recording.

### **3. Statement of Intent**

CCTV cameras are installed in such a way that they are not hidden from view. We do not covertly record anyone. Signs are displayed where relevant so that staff, pupils, visitors and members of the public are made aware that they are entering an area covered by CCTV. The signs are being upgraded to ensure they contain contact details as well as a statement of purposes for which CCTV is used.

The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.

The school will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

The system has been designed so far as possible to deny observation on adjacent private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design have endeavoured to ensure that the 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.

Warning signs, as required by the Code of Practice of the Information Commissioner, will be clearly visible on the site and make clear who is responsible for the equipment, these are currently being updated.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

CCTV images are not retained for longer than necessary, taking into account the purposes for which they are processed. Data storage is automatically overwritten by the system after a period of 28 days.

Recorded images will only be retained long enough for any incident to come to light (e.g., for a theft to be noticed) and the incident to be investigated. In the absence of a compelling need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 6 months.

## **5. System Management**

Access to the CCTV system and data shall be password protected and will be kept in a secure area.

The CCTV system will be administered and managed by Morgan Coetzee, IT Manager who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager, the system will be managed by the IT Technician.

The system and the data collected will only be available to the Systems Manager, his/her replacement and appropriate members of the pastoral and senior leadership teams as determined by the Headteacher.

The CCTV system is designed to be in operation 24 hours, 7 days a week, all year round, though the school does not guarantee that it will be working during these hours.

The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that the cameras are functional.

Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by providing clear, usable images.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

Where a person other than those mentioned above requests access to the CCTV data or system, the System Manager must satisfy him/herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists, access will be refused.

Details of all visits and visitors will be recorded in a system logbook via the schools ticketing system including time/data of access and details of images viewed and the purpose for so doing.

## **6. Downloading Captured Data on to Other Media**

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings), any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures: -

- (a) Each downloaded media must be identified by a unique mark (ticket number).
- (b) Before use, each downloaded portable media must be cleaned of any previous recording.
- (c) The System Manager will register the date and time of downloaded media insertion, including its reference (via ticketing system).
- (d) Downloaded portable media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a downloaded media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.
- (e) If downloaded media is archived, the reference must be noted.
- (f) If downloaded media is put onto a device, the device will be encrypted, and password protected.

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his/her replacement and the Headteacher and other authorised pastoral and senior leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable, if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the downloaded media (and any images contained thereon) remains the property of the school and downloaded media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a

downloaded media, this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the school to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until needed by the police.

Applications received from outside bodies (e.g., solicitors or parents) to view or release images will be referred to the school's Data Protection Officer and a decision made by the Headteacher or in his / her absence the Business Manager in consultation with the school's Data Protection Officer.

## **7. Complaints About the Use of CCTV**

Any complaints in relation to the school's CCTV system should be addressed to Jo-Anne Hoarty, Headteacher.

## **8. Requests for Access by the Data Subject**

The Data Protection Act provides data subjects – those whose image has been captured by the CCTV system and can be identified - with a right to access data held about themselves, including those obtained by CCTV. Requests for such data should be made to Kate Warren, Business Manager

## **9. Public Information**

Copies of this policy will be available to the public from the school office.

**Review: 2027 / 28 by Leadership Team for presentation to the Resources and Personnel Committee of the Governing Board.**