



CCTV policy

ICO registration number: Z1782825

Last updated by senior leaders	November 2020
Last reviewed by data protection officer	June 2021
Last reviewed by external consultant	June 2021
Next review due	June 2022

St. John's Prep. & Senior School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.

- The system comprises a number of fixed and dome cameras.
- The system does not have sound recording capability.
- The CCTV system is owned and operated by the school, the deployment of which is determined by the Principal and the Headteacher at the Senior School.
- The CCTV is monitored by the Principal and the Headteacher. The Office is permanently locked. It is also accessed via an app which only the Principal and the Headteacher have. A password is required in order to put this app on their electrical devices. This app does not have a recording capability. At the Prep School, the CCTV is monitored in the main office.
- The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images is covered by the Data Protection Act 1998. This policy outlines the school's use of CCTV and how it complies with the Act.
- All authorised operators with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained to understand their responsibilities under the CCTV Code of Practice.

Statement of intent

- The School complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. [The Code of Practice is published here.](#)
- CCTV warning signs are clearly and prominently placed at the two external entrances to the School and along the drive up to the School.
- The planning and design has endeavoured to ensure that the Scheme 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.

Siting the cameras

- Cameras are sited so they only capture images relevant to the purposes for which they are installed (described above) and care is taken to ensure that reasonable privacy expectations are not violated. The School ensures that the location of equipment is carefully considered so that images captured comply with the Data Protection Act.
- The school makes every effort to position cameras so that their coverage is restricted to the premises, which may include outdoor areas.

- CCTV may be used in some classrooms to prevent theft and damage to school property. Devices are clearly visible as they are positioned either on the ceiling or on the walls. They are never used in private areas, such as toilet facilities.
- Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

Covert monitoring

- The school may in exceptional circumstances set up covert monitoring. For example:-
 - i) Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
 - ii) 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 Principal or the Headteacher.
- Covert monitoring must cease following completion of an investigation.
- Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles.

Storage and retention of CCTV images

- Any recordings last for seven weeks and they automatically erase themselves after that time.

Access to CCTV images

- Access to recorded images will be restricted to the individuals named above authorised to view them, and will not be made more widely available.

Subject Access Requests (SAR)

- Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- All requests should be made in writing to the Principal or the Headteacher. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
- The school will respond to requests within 40 calendar days of receiving the written request and fee.
- 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.

Access to and disclosure of images to third parties

- There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).
- Requests should be made in writing to the Principal.
- The data may be used within the school's discipline procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

Complaints

- Complaints and enquiries about the operation of CCTV within the school should be directed to the Principal or the Headteacher.

Checklist

- St. John's CCTV system and the images produced by it are controlled by the Principal and the Headteacher, who are responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998).
- St. John's Prep & Senior School has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of pupils and staff. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked (Date)	By	Date of Next Review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	YES	Mrs C. Tardios (Principal)	03/06/2022
There is a named individual who is responsible for the operation of the system.	YES		
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	YES		
Staff and members of the school community were consulted about the proposal to install CCTV equipment.	YES		
Cameras have been sited so that they provide clear images.	YES		
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	YES		
There are visible signs showing that CCTV is in operation.	YES		
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	YES		

The 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.	YES		
Except for law enforcement bodies, images will not be provided to third parties.	YES		
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.	YES		
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	YES		

Further information

Further information on CCTV and its use is available from the following:

- [CCTV Code of Practice](#) (published by the Information Commissioners Office)
- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998