



Simon Langton
Grammar School for Boys

CCTV Policy

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Model policy used	<i>DPO</i>

1. INTRODUCTION

Closed Circuit Television Systems (CCTVS) are installed in *Simon Langton Grammar School for Boys (The School)*. New CCTV systems will be introduced in consultation with staff and the Governing Body. Where systems are already in operation, their operation will be reviewed regularly in consultation with staff and the Governing Body.

The policy can be found on the school website, alternatively the Headteacher will provide a copy to staff, students, parents, and visitors to the school on request.

2. PURPOSE OF POLICY

The purpose of this policy is to regulate the use of Closed-Circuit Television and its associated technology in the monitoring of both internal and external area of the school.

CCTV systems are installed in the school for the purpose of enhancing security of the building and its associated equipment as well as creating a sense of security for the occupants.

CCTV surveillance at the School is intended for the purposes of:

- Protecting the school buildings and school assets, both during and after school hours
- Promoting the health and safety of staff, pupils, and visitors
- Preventing bullying;
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
- Supporting the Police in a bid to deter and detect crime
- Assisting in identifying, apprehending, and prosecuting offenders
- Ensuring that the school rules are respected so that the school can be properly managed

3. SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. Where classes and activities are carried out in rented premises, the school will ensure that CCTV systems, where installed, are operated only in a way that is compatible with the provisions of this policy.

4. GENERAL PRINCIPLES

The school has a statutory responsibility for the protection of its property and equipment, as well as providing a sense of security to its employees, students and visitors. The school owes a duty of care under the provisions of Safety, Health and Welfare at Work Act 2005 and associated legislation and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life of the school community by integrating the best practices governing the public and private surveillance of its premises.

The use of the CCTV system will be conducted in a professional, ethical, and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g., CCTV will not be used for monitoring employee performance.

Information obtained through the CCTV system may only be released when authorised by the Head of School following consultation with the Chair of Governors. If a law enforcement authority, such as the police, is seeking a recording for a specific investigation, the police may

require a warrant and accordingly any such request made by the police should be requested in writing and the school will immediately seek legal advice.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school. This policy prohibits monitoring based on the characteristics and classifications contained in equality and other educational and related legislation e.g., race, gender, sexual orientation, national origin, disability etc.

Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school or a student attending the school.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the school. Recognisable images captured by CCTV systems are "personal data." They are therefore subject to the provisions of the Data Protection Acts 1988 and 2003.

5. JUSTIFICATION FOR USE OF CCTV

Section 2(1)(c)(iii) of the Data Protection Acts requires that data is "adequate, relevant and not excessive" for the purpose for which it is collected. This means that the school needs to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV to control the perimeter of the school buildings for security purposes has been deemed to be justified by the Senior Management Team and the Governing Body. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

CCTV systems will not be used to monitor normal teacher/student classroom activity in school.

In other areas of the school where CCTV has been installed, the Head of School has demonstrated that there is a proven risk to security and/or health & safety and that the installation of CCTV is proportionate in addressing such issues that have arisen prior to the installation of the system.

CCTV Video Monitoring and Recording of Public Areas in Simon Langton Grammar School for Boys may include the following:

- **Protection of school buildings and property:** The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services, Parking areas, Main entrance/exit gates, Traffic Control
- **Monitoring of Access Control Systems:** Monitor and record restricted access areas at entrances to buildings and other areas
- **Verification of Security Alarms:** Intrusion alarms, exit door controls, external alarms
- **Criminal Investigations (carried out by the police):** Robbery, burglary, and theft surveillance

6. LOCATION OF CAMERAS AND SIGNAGE

The location of cameras is a key consideration. Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. The school has selected locations for the installation of CCTCV cameras which are least intrusive to protect the privacy of individuals. Cameras placed to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or private property.

The location of CCTV cameras will also be indicated to the Governing Body. Signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation, as well as at the entrance to the school property. Signage may include the specific purpose(s) for which the CCTV camera is in place in each location and a contact number for further information.

Example



Appropriate locations for signage will include:

- at entrances to premises i.e., external doors, school gates
- reception area
- at or close to each internal camera

7. COVERT SURVEILLANCE

The school will not engage in covert surveillance. Where the police request the school to carry out covert surveillance on school premises, such covert surveillance may require the consent of a judge. Accordingly, any such request made by the police will be requested in writing and the school will seek legal advice.

8. STORAGE & RETENTION

Section 2(1)(c)(iv) of the Data Protection Acts states that data "shall not be kept for longer than is necessary for the purposes for which it was obtained". **Accordingly, the images captured by the CCTV system will be retained for a maximum of 28 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue eg a break-in or theft.**

9. ACCESS

The images/recordings (ie tapes/DVDs) will be stored in a secure environment with a log of access kept. Access to the CCTV system and stored images will be restricted to authorised personnel only and unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel and a log of access to tapes/images will be maintained.

In relevant circumstances, CCTV footage may be accessed by:

- The Police when the school is required by law to make a report regarding the commission of a suspected crime; or following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on school property.
- The HSE, Department of Education and Skills and/or any other statutory body charged with child safeguarding; or
- The Headteacher, Deputy Head of School, the relevant Year Head or other members of the teaching staff to assist in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed.
- Data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to the school
- Individuals (or their legal representatives) subject to a court order.
- The school's insurance company where it requires the footage in order to pursue a claim for damage done to the insured property.

Access requests: On written request, any person whose image has been recorded has a right to be given a copy of the information recorded which relates to them, provided always that such an image/recording exists i.e., has not been deleted or an exemption/prohibition does not apply to the release. Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that the other person is not identified or identifiable. To exercise their right of access, a data subject must make an application in writing to the school.

A person should provide all the necessary information to assist the school in locating the CCTV recorded data, such as the date, time, and location of the recording. If the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data and may not be handed over by the school.

10. RESPONSIBILITIES

The Head of School or a delegate will ensure that the use of CCTV systems is implemented in accordance with the policy set down by the school, including but not limited to:

- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access (e.g., an access log) to or the release of tapes or any material recorded or stored in the system
- Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only and are not duplicated for release
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally

- Approve the location of temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events. [NOTE: Temporary cameras do not include mobile video equipment or hidden surveillance cameras used for authorised criminal investigations by the police].
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place
- Co-operate with the Health & Safety Officer of the school in reporting on the CCTV system in operation in the school
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy”
- Recorded images on tapes/DVDs/digital recordings are not stored for a period longer than 28 days unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the chair of Governors.
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy

11. IMPLEMENTATION & REVIEW

The policy will be reviewed every 3 years and will consider changes to guidelines, legislation and feedback from parents/guardians, students, staff, and others. (e.g., from the Data Protection Commissioner, Department of Education and Skills, national management bodies).

The date from which the policy will apply is the date of adoption by the Board of Governors. Day to day implementation of the policy will be monitored by the Premises Manager.