

Catch22 group policy

CCTV in Schools

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Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Policy Owner:	Governance & Risk
Queries to:	Data Governance Manager
Date created:	01/06/2021
Date of last review:	August 2025
Date of next review:	August 2027
Catch22 group, entity, hub:	Catch22 Education
4Policies level (all staff or managers only)	All Staff and on website for general public

Catch22 UKGDPR standards

When processing personal data staff will uphold the following standards, where possible:

- **Model of least privilege**
Staff will ensure that security controls are implemented, to data held physically and electronically, to ensure that personal data is only accessed by staff that have a defined need to access it.
- **Data minimisation**
Staff will limit the collection of personal information to that which is directly relevant and necessary to accomplish a specified purpose.
- **Data subject rights**
Staff will ensure that the rights that are afforded to individuals under the UKGDPR are upheld appropriately and in accordance with the regulation and associated legislation.
- **Accountability**
Staff will adhere to and remain compliant with the UKGDPR principles and contribute to demonstrating the organisations compliance.
- **Anonymisation, Pseudonymisation and Encryption**
Where possible and appropriate staff will look to anonymise/pseudonymise and encrypt personal data in order to protect the privacy rights of individuals.

1. Introduction

The purpose of this policy is to regulate the management, operation and use of the Close Circuit Television (CCTV) at Catch22 Schools, hereafter referred to as 'the school'.

The CCTV system comprises of a number of fixed cameras which are installed on the premises, both internally and externally and are in operation 24 hours a day.

2. Objectives of the CCTV system

Cameras will be used to monitor activities within the school, its car parks, and other public areas for the purpose of:

- Enhancing security of the building and its associated equipment

- Protecting the school buildings and school assets, both during and after school hours;
- Promoting the health and safety of staff, pupils and visitors;
- 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;

3. Statement of intent

This policy relates directly to the location, use of the CCTV and the monitoring, recording, and subsequent use of such recorded material. The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice, the Surveillance Camera Commissioner guidance, Data Protection Act 2018, the UK General Data Protection Regulations (UKGDPR) and the Human Rights Act 1998 to ensure it is used responsibly and safeguards both trust and confidence in its use.

The ICO Code of Practice is published at: <https://ico.org.uk/about-the-ico/ico-and-stakeholder-consultations/cctv-code-of-practice-revised/>

Surveillance camera code of practice and Surveillance Camera Commission code of practice guidance and principles are published at:

<https://www.gov.uk/government/publications/surveillance-camera-code-of-practice>

This policy has been created with regard to the following statutory and non-statutory guidance:

- Home Office (2013) 'The Surveillance Camera Code of Practice'
- Information Commissioner's Office (ICO) (2014) 'CCTV Code of Practice'
- Surveillance Camera Commissioner guidance

This policy has due regard to legislation including, but not limited to, the following:

- The UK General Data Protection Regulation 2021
- The Data Protection Act 2018

- The Freedom of Information Act 2000
- The Protection of Freedoms Act 2012
- The Regulation of Investigatory Powers Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998
- The Children Act 1989
- The Children Act 2004
- The Equality Act 2010
- The Human Rights Act 1998

4. Operation of the system

The CCTV system is owned and operated by the school, the deployment of which is determined by the Headteacher, Catch22 Education Senior Leadership Team (ESLT) and Data Protection Officer (DPO). The operation of this scheme will be managed by the Headteacher in accordance with the principles and objectives expressed in this policy.

The CCTV system is limited to uses that do not violate the individual's reasonable expectation to privacy and be consistent with all existing policies adopted by the school, including the provisions set down in equality and other educational and related legislation.

The introduction of, or changes to, CCTV monitoring will be subject to consultation with the Headteacher, ESLT, DPO, staff and members of the school community. A Data Protection Impact Assessment (DPIA) or a DPIA review will be undertaken prior to any changes to the system.

All authorised staff with access to images are aware of:

- the procedures that need to be followed when accessing the recorded images.
- their responsibilities in following the CCTV Code of Practice; and
- the restrictions in relation to access to, and disclosure of recorded images.

The CCTV system will be operated 24hours per day, every day of the year.

Where CCTV is cited in classrooms or has audio capability, these will not be used unless there are exceptional circumstances and has the prior approval of the Catch22 Education Senior Leadership Team.

Where CCTV is used, the school will ensure that prominent signs are placed within the controlled area (Appendix 1).

5. Definitions

For the purpose of this policy a set of definitions will be outlined, in accordance with the Surveillance Camera Code of Practice:

- CCTV – Close Circuit Television is a system of cameras which stream an image to a central monitor, where activity can be recorded.
- Surveillance – monitoring the movements and behaviour of individuals through CCTV.
- Overt surveillance – any use of surveillance for which authority does not fall under the Regulation of Investigatory Powers Act 2000.
- Covert surveillance – any use of surveillance which is intentionally not shared with the subjects it is recording. Subjects will not be informed of such surveillance. Covert surveillance will only be operable in extreme circumstances for example a Court Order from the Police.
- Data - is information which is stored electronically or in certain paper-based filing systems and may include Personal Data. In respect of CCTV, this generally means video images. It may also include static pictures such as printed screen shots.
- Data Controllers - means the person or organisation that determines when, why and how to process Personal Data. Catch22 is the Data Controller of all Personal Data used in all schools for our own commercial and educational purposes.
- Data Processors - means the person or organisation that is not a Data User that Processes Personal Data on our behalf and in accordance with our instructions (for example, a supplier which handles Personal Data on our behalf).

- Data Users - are those of our employees whose work involves processing Personal Data. This will include those whose duties are to operate CCTV camera systems, to record, monitor, store, retrieve and delete images. Data users must protect the data they handle in accordance with this Policy and our Data Protection Policy.
- Data Subjects - means a living, identified or identifiable individual about whom we hold Personal Data as a result of the operation of the CCTV system.
- Personal Data - means any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. This will include video images of Data Subjects.
- Processing - means any activity that involves the use of Personal Data. It includes obtaining, recording, or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties

6. Location of the cameras

All cameras are sited in plain sight and only capture images relevant to the purposes for which they have been installed, as described above (Appendix 2).

Care will be taken to ensure that reasonable privacy expectations are not violated and ensure that the images captured comply with the legislation.

The school will make every effort to position the cameras so that their coverage is restricted to the school premises.

7. CCTV Signage

It is a requirement of the Data Protection Act 2018 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled (Appendix 1). The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded.
- The purposes of using CCTV.
- The name of the school.
- The contact telephone number or address for enquiries.

8. Covert monitoring

The school does not engage in covert surveillance, however there may be exceptional circumstances for the set up covert monitoring.

In these circumstances:

- The request from Police must have a legal basis preferably accompanied by a Court Order.
- In the absence of a Court Order, authorisation must be obtained from the Regional Manager, Catch22 College Management Team and Data Protection Officer (DPO).
- 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, e.g., toilets.

The Human Rights and Employment Rights of all the people who use the School must be respected and covert monitoring must only be used as a last resort.

9. Storage and retention of CCTV images

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 the people whose images have been recorded.

The CCTV images will be kept for no longer than 31 days unless there is a current incident that is being investigated.

Storage of CCTV images is via CCTV hard drive located in a secure office; the school will store data securely at all times.

Specific recordings which the school wishes to retain after this time will be documented by

the Data Protection Officer. Only a primary copy should be kept, and secondary copies should only be created in exceptional circumstances.

10. Security

Access to the surveillance system, software and data is strictly limited to authorised school staff and is password protected.

The school's authorised CCTV system users are:

- Jamie Nielsen , Headteacher.
- Carol Hardwick, Headteacher
- Alexander Sutton, Assistant Headteacher, Norwich School
- Charlotte Higgins, Assistant Headteacher, Kings Lynn School

Live feed is available to view only on monitors placed in the Assistant Headteacher's office. No viewing facilities are available elsewhere, and the system access is password protected.

The location of the visual display monitors/desk top access are known only to each School's authorised CCTV system users and the DPO.

The main control facility is kept secure and locked when not in use.

Surveillance and CCTV systems will be tested for security flaws once a month to ensure that they are being properly maintained at all times. Any cameras that present faults will be repaired immediately to avoid any risk of a data breach. (Appendix 2)

11. Access to CCTV images

Access to recorded images will be restricted to the staff authorised to view them and will not be made widely available. Supervising the access and maintenance of the CCTV System is the responsibility of:

- Jamie Nielsen , Headteacher.
- Carol Hardwick, Headteacher.

- Alexander Sutton, Assistant Headteacher, Norwich School
- Charlotte Higgins, Assistant Headteacher, Kings Lynn School

There may be occasions where by the Headteacher or Catch22 Education Senior Leadership Team may delegate the administration of the CCTV System to another staff member.

When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis. All viewings by the school will be documented by the Data Protection Officer and Headteacher.

12. Subject Access Request (SAR)

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the GDPR via a Subject Access Request.

All requests should be made the Data Protection Officer via email at DPO@catch-22.org.uk Individuals submitting request for access will be asked to provide sufficient information to enable footage relating to them to be identified e.g., time, date, and location and identification may be requested from where appropriate.

Where the school does not have the facility to provide copies of CCTV footage the option to view the CCTV footage may be available.

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 and this will be documented accordingly by the DPO and Headteacher.

All attempts will be made to allow the viewing of the video. If others can be identified, the DPO in conjunction with the Headteacher will assess the risk to others from the video being viewed by the requester. If there is likely to be a risk of harm, the School may consider alternative options where appropriate:

- Obtain the consent of others to share the video with the requester.
- Provide a transcript or written description of the contents of the video.

If all options have been considered and it is still felt there to be a risk to others from the requester viewing the video, the School may decline the request to view the video, although relevant exemptions in the Data Protection Act 2018 will need to be identified by the School provided to the requester.

13. Access and disclosure of images to third parties

All third-party requests e.g., solicitors, to view or release recordings will be referred to the DPO to establish the appropriate documentation or a Court Order, in accordance with UK data protection law prior to any information in connection with the CCTV recording being released.

Requests for images from the above should be made via email to both Jamie Nielsen (Headteacher): jamie.nielsen@catch-22.org.uk and the Data Protection Officer: DPO@Catch-22.org.uk

The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

The Data Protection Officer will keep a record of all viewing or release of any CCTV images or recording to third parties. The following information will be recorded:

- Date access requested.
- Details of person(s) requesting the viewing.
- Date and time of footage requested to view.
- Camera(s) location viewed.
- Date footage released/viewed.

14. Requests by the Police

Information obtained through video monitoring will only be released when authorised by the Data Protection Officer. If the Police request CCTV images for a specific investigation, any such request made by the Police should be made in writing by the accurate completion of the appropriate form under Schedule 2 part 1 paragraph 2 of the Data Protection Act

2018 or UKGDPR Article 6 (1)(d) or 9 (2)(c). A copy of this form is to be sent to the Data Protection Officer prior to any discussion taking place.

The recording will remain the property of the school, and both the recording and information contained within it are to be treated in accordance with this policy and the Data Protection Act 2018.

Should a recording be required as evidence, the DPO and Headteacher will ascertain the best way to separate the footage dependant on the CCTV system within the school. If the school is requested to retain the stored recordings for possible use as evidence in the future, the recordings will be documented as outlined in Section 13 above and securely stored in a pre-determined place by the DPO and Headteacher within the school until they are needed by the Police.

Where the school is reporting the crime with a view to prosecuting, the appropriate form under Schedule 2 part 1 paragraph 2 of the Data Protection Act 2018 or UKGDPR Article 6 (1)(d) or 9 (2) (c) will not be required as the lawful basis for this has already been established. In these incidents the following information must be provided to the DPO for central recording:

- Reason for releasing
- Date and time of incident contained in the footage being released.
- All associated documentation in connection with the incident.
- Camera(s) location viewed.
- Details of person(s) receiving the footage.
- Date footage released/viewed.
- Location where information will be securely stored onsite.
- Anticipated length of time for continued storage of the footage.

15. Breaches of the procedures (including security breaches)

Any breach of these procedures by school staff will be initially reported as a data incident and the process followed by the DPO as outlined in the Catch22 Data Incident Policy. This will then be reviewed by DPO and Headteacher, in order for any appropriate action to be taken in line with the Code of Conduct Policy.

Information obtained in violation of these procedures may not be used in a disciplinary proceeding against an employee of the school, or a student.

16. Freedom of Information

The School may receive requests under the Freedom of Information Act (FOIA). All freedom of information requests should be referred to the Headteacher or in their absence the SLT. These must be responded to within 20 working days from receipt of the request.

17. Responsibilities

The Data Protection Officer is responsible for ensuring that the use of CCTV systems is implemented in accordance with all aspects of UK data protection legislation relevant to this policy.

Catch 22 is the data controller and the School therefore has overall responsibility for ensuring that the CCTV system and all associated information is maintained, including security and access arrangements in accordance with regulations.

The role of the data controller includes:

- Processing surveillance and CCTV footage legally and fairly
- Collecting surveillance and CCTV footage for legitimate reasons and ensuring that it is used accordingly.
- Collecting surveillance and CCTV footage that is relevant, adequate, and not excessive in relation to the reason for its collection.
- Ensuring that any surveillance and CCTV footage identifying an individual is not kept for longer than is necessary.

- Protecting footage containing personal data against accidental, unlawful destruction, alteration, and disclosure.

18. Complaints

Complaints and enquiries about the operation of CCTV within the School should be directed to the Data Protection Officer and Headteacher in the first instance.

19. Policy Review

The Data Protection officer is responsible for monitoring and reviewing this policy. This policy will be review annually. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

Version	Author(s)	Date Produced	Amendments
1.0	DPO	16/05/2021	New Catch22 CCTV Policy 2021

20. Related Policies

Data Protection: Over-arching policy 2021

Data Protection: Data incident policy 2021

Data Protection: Subject access request policy 2021

Data Protection: Recording of processing activity policy 2021

Data Protection: Privacy impact policy 2021

Data Protection: Consent to process data policy 2021

Data Protection: Observing data subject rights policy 2021

Data Protection: Data quality policy 2021

Data Protection: Data privacy by design policy 2021

Data Protection: Data & record management policy 2021

Appendix 1

CCTV Signage

Example Signs



WARNING

CCTV cameras in operation

Images are being monitored and recorded for the purpose of crime-prevention, the prevention of anti-social behaviour, for the safety of our staff and students and for the protection of the School and its property. This system will be in operation 24 hours a day, every day. These images may be passed to the police.

This scheme is controlled by the School.

For more information contact<phone number>.....

Appendix 2

Location of the Cameras

Norwich School:

- 1) Downstairs Inside – Above the advocate office door
- 2) Downstairs Inside – Above Classroom 2 & 3
- 3) Downstairs Inside – Above the Girls Toilets (corridor)
- 4) Downstairs Long Corridor
- 5) Downstairs - Warehouse
- 6) Upstairs - Top of the back staircase
- 7) Upstairs – Outside Maths room
- 8) Upstairs – Top of the inside staircase
- 9) Outside Front of the building – looking down on the front door and car
- 10) Outside Above the shutter – looking down on the courtyard.

Kings Lynn School

- 1) Stairs
- 2) Front door
- 3) Ace room
- 4) Kitchen
- 5) Top landing
- 6) Upstairs corridor
- 7) Side path
- 8) Back outside area
- 9) Foyer

Appendix 3

CCTV Maintenance Checklist

Camera Lens	
	Check the camera lens is focused and adjusted properly

	Check the camera view hasn't been knocked off path and you can see your property perimeter clearly
	Clean any dust or marks off the camera lens with a can of compressed air and wipe down the camera casing with a microfibre cloth
	Check that the motion detection sensors are working, if you have them
	Use your controller to check that the camera's functions, such as zoom and pan are working correctly
	Trim back any foliage that may be obscuring the view
	Check that the cameras are securely attached to the wall
Wiring	
	Check wiring for any wear and tear or exposed wires
	Check for loose wires
	Check that you're getting a clear transmission of sound and picture with no distortion
Monitors	
	Check that the monitors are showing a clear picture and that the brightness and contrast settings are correctly adjusted
	Check all of your switches and individual equipment are functioning fully
	Clean all monitors and equipment of dust and grime with a microfibre cloth and a weak cleaning solution
	Check cables leading from the equipment are in good condition and that there are no weak connections
	Check that the correct time and date stamp is set

Annex 1: Equality Impact Assessment

1. Summary

This EIA is for:	CCTV in Schools
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EIA completed by:	Beverley Clark, Data Protection Officer
Date of assessment:	01/06/2021
Assessment approved by:	

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010.

Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes
This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully considered and addressed, whether or not people share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	☐	☒	☐	
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	☐	☒	☐	
Gender reassignment (transsexual, transgender, trans) Does this policy impact on people who are transitioning from one gender to another (at any stage)	☐	☒	☐	
Marriage and civil partnership Does this policy impact on people who are legally married or in a civil partnership?	☐	☒	☐	
Pregnancy and maternity (in work this is linked to maternity leave, non-work this is for 26 weeks after giving birth) Does this policy impact on people who are pregnant or in their maternity period following the birth of their child?	☐	☒	☐	
Race Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins	☐	☒	☐	

Religion and belief Does this policy impact on people who practice a particular religion or none, or who hold particular religious or philosophical belief or none?	☐	☒	☐	
Sex Does this policy impact on people because they are male or female?	☐	☒	☐	
Sexual orientation Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?	☐	☒	☐	

3. More information/notes

Please add any links to key documents or websites to evidence or give further detail on any impacts identified.