The Crypt School Surveillance and CCTV Policy

Lead persons: Senior Deputy Head
Support persons: Compliance Officer, IT Manager
Governing Body Committee: Pupil Education and Outcomes Committee

1 Policy Statement

The purpose of this policy is to set out the management, operation and use of the Close Circuit Television (CCTV) at The Crypt School.

2 Introduction

The Crypt School uses CCTV images to reduce the threat of crime generally, protecting our premises and helping to ensure the safety of all of our staff, pupils and visitors consistent with respect for the individuals' privacy.

The system comprises a number of fixed and dome cameras located externally to provide coverage of the gates, outside play facilities and car parks, internally in corridors and shared spaces such as IT Rooms and common rooms. The system does not have sound recording capability.

This policy takes account of all applicable legislation and guidance, including:

- UK General Data Protection Regulation ("GDPR")
- Data Protection Act 2018
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998
- Surveillance Commissioner Code of Practice

3 Scope

This policy applies to all staff, governors, contractors, agents, volunteers, representatives and temporary staff, working for or on behalf of the School. The requirements of this policy are mandatory for all these parties.

4 Purpose of CCTV

The Crypt School uses CCTV for the following purposes:

- To provide a safe and secure environment for pupils, staff and visitors. During any suspension of the biometric secure entry system, approved staff may conduct live monitoring of site entrances for security reasons.
- To prevent the loss of, theft or damage to The Crypt School buildings and/or assets
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

5 Siting of Cameras

All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.

Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The Crypt School will make all reasonable efforts to ensure that areas outside of The Crypt School premises are not recorded.

Signs will be placed in prominent positions to inform individuals that they are in an area within which CCTV is in operation.

CCTV First Aid Room

Whilst a CCTV camera is situated in our first aid room, the system operates on a live monitoring basis only and does not record or store any footage.

- The camera is used solely for real-time monitoring of children to ensure their safety and well-being
- The system is not set up to record, store, or retain images
- There is no playback capability and no images are archived
- Monitoring will only be conducted by authorised personnel for security and safety purposes

As no footage is recorded or retained, personal data is not stored or processed beyond real-time observation. Appropriate signage is displayed to inform individuals that live CCTV monitoring is taking place.

6 Privacy Impact Assessment

Prior to the installation of any new CCTV camera, or system, a privacy impact assessment will be conducted to ensure that the proposed installation is compliant with legislation and ICO guidance.

7 Management and Access

The CCTV system will be managed by the **IT Manager.**

Access to the system will be restricted to approved staff as required to fulfil the duties of the school. Requests for stored footage will be made to them for consideration before approval.

The school's authorised CCTV system operators are:

- Phil Stanlake: data processor/Senior Deputy Head +
- Susan Glock: data processor/Deputy Head
- Matthew Bevan: data processor/Assistant Head (Pastoral)
- Gordon Taylor: data processor/IT Manager +
- Scott Baldwin: data processor/ IT Tech
- Joseph Ash-Young: data processor/ IT Tech
- Peter Cresswell: data processor/Site Staff +
- Mark Halliday: data processor/Site Staff +
- Lesley Smith: data processor/Site Staff +
- Andrew Baylis data processor/Site Staff +
- Christopher Germaine / HoY Pastoral
- Harry Windsor / HoY Pastoral
- Lynn Green: data processor/ Pastoral
- Hayley Wood: data processor/Pastoral
- Susanne Capell: data processor/Site Staff
- Steph Williams: data processor/Pastoral
- Louise Price: data processor/ Pastoral
- Kirsty Szekeres / Pastoral
- Eileen Price: data processor/Pastoral
- Hannah Attwood/ data processor/Pastoral
- Deborah Jordan / Pastoral

Access to the CCTV system is restricted to onsite except for named staff who need to monitor the site out of hours denoted by +

The CCTV system is checked **monthly** by the IT Manager to ensure that it is operating effectively.

8 Storage and Retention of Images

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

Recorded images are stored only for a period of 30 Days unless there is a specific purpose for which they are retained for a longer period. The Systems Manager will regularly review those retained images (at least three times a year) and permanently delete those that are no longer required.

The Crypt School will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

- CCTV recording systems being located in restricted access areas;
- The CCTV system being encrypted/password protected;
- Restriction of the ability to make copies to the above specified members of staff;
- A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by The Crypt School

9 Disclosure of Images to Data Subjects

Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection legislation, and has a right to request access to those images.

Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection legislation. Such a request should be considered in the context of The Crypt School Data Protection Policy.

When such a request is made the IT Manager will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The Crypt School must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals then The Crypt School must consider whether:

- The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
- The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or

- If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

A record must be kept, and held securely, of all disclosures which sets out:

- When the request was made;
- The process followed by the IT Manager in determining whether the images contained third parties;
- The considerations as to whether to allow access to those images;
- The individuals that were permitted to view the images and when; and
- Whether a copy of the images was provided, and if so to whom, when and in what format.

10 Disclosure of Images to Third Parties

The Crypt School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation. Recorded CCTV images that have been provided to third parties will be retained for 30 days unless they are otherwise required for a purpose specified under paragraph 4.

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

If a request is received from a law enforcement agency for disclosure of CCTV images then The Crypt School must follow the same process as above in relation to subject access requests. Details should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

The information above must be recorded in relation to any disclosure.

If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

11 Review of CCTV Policy

This policy will be reviewed annually.

12 Misuse of CCTV systems / Policy Breach

The misuse of the CCTV system could constitute a criminal offence.

Any breach of the Code of Practice by school staff or other person who is bound by this policy will be initially investigated by the Headmaster (or Chair of Governors, where necessary), in order for them to take the appropriate disciplinary action.

Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

13 Complaints relating to this policy

Any complaints relating to this policy or to the CCTV system operated by The Crypt School will be handled in accordance with the School's Complaints Policy.

Approved by Full Board of Trustees: October 2020

Review Cycle: 1 year

Reviewed by SLT and approved by Headmaster: November 2026

Date of next review: September 2027