



CCTV Policy

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Member of Staff Responsible:	Miss S Walker
SLT: Headteacher:	Mark Rayner
Chair of the Academy Representatives: Nominated Academy Representative:	Rob Fello
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Mission Statement

In accordance with our Mission statement, at St Thomas More we strive to secure a shared vision for all associated with our school community. Fundamentally, we aspire to maintain a safe, happy and caring environment where 'excellent relationships between pupils, staff parents/ carers, support a caring community.'

St Thomas More Catholic Academy Mission Statement

Christ is at the heart of our community, where everyone is known and loved.

In fulfilling our mission we will:

become a genuine school of prayer; live as a community of love, peace and reconciliation; value everyone's dignity as a true child of God and promote the growth and achievement of the whole person.

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Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at St Thomas More Catholic Academy. The system comprises a number of fixed and dome cameras located within and around the school buildings. All cameras are controlled from the Senior Operations Manager and Student Support Offices and the system can only be accessed by nominated staff. The school owns the internal CCTV system.

The Policy will be subject to review by the Academy Representatives, to include consultation as appropriate with interested parties.

CCTV Systems

1. Data Controller of the Scheme – M Rayner, Headteacher, St Thomas More Catholic Academy, Longton Hall Road, Longton, Stoke on Trent ST3 2NJ.
2. The Governing Body of St Thomas More Catholic Academy considers that the CCTV Scheme can contribute to security and the health and safety of pupils, staff and visitors.
3. The Headteacher and Academy Representatives at the school have considered the need for using a CCTV system and have decided that it is required for the prevention of crime

and for protecting the safety of students, staff and visitors to the site. It will not be used for any other purpose.

4. The general management of CCTV at St Thomas More Catholic Academy is currently vested with the Senior Operations Manager.
5. The day to day management and operation of the CCTV system is the responsibility of the Senior Operations Manager, Student Support Officers and Reception Staff.

The principal purposes of St Thomas More Catholic Academy's use of CCTV:

- To increase personal safety of students, staff and visitors and reduce the fear of crime
- To protect the school buildings and their assets
- To protect members of the public and private property
- To improve security and to detect persons who are not authorised to be on the premises
- To support Police in a bid to deter and detect crime
- To assist in identifying, apprehending and potentially prosecuting offenders
- To identify individuals engaged in improper conduct.

Statement of Intent

This policy has been drafted in accordance with the Surveillance Camera Code of Practice (June 2013). St Thomas More Catholic Academy is registered as a Data Controller with the Information Commissioner's Office in accordance with the Data Protection Act 2018. This Policy follows the Data Protection Act guidelines. The school will treat the system and all information, documents and recordings obtained and used as data protected by the Act.

Cameras will be used to monitor activities within the school and the grounds to identify adverse activity actually occurring, anticipated or perceived, and for the purpose of securing the safety and well-being of the school's students and staff, together with its visitors.

Static cameras are positioned to ensure they do not focus on private homes, gardens and other areas of private property. At no time will a camera be directed to follow or track an individual.

Materials or knowledge secured as a result of CCTV use will not be used for any commercial purpose. CDs/Images will only be released for use in the investigation of a specific crime and with the written authority of the police. CDs/images will never be released to the media for purposes of entertainment.

The planning and design has endeavoured to ensure that the CCTV Scheme will give maximum effectiveness and efficiency within available means, 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, have been placed at both visitor and student entrances of the school.

Siting of Cameras

1. The location of CCTV cameras is based upon a variety of information including security, health and safety and safeguarding.
2. All such CCTV equipment installed in school will only be sited in such a way that it only monitors those spaces that are intended to be covered by the equipment.
3. If domestic areas such as windows or areas not intended to be covered by the scheme border those spaces which are intended to be covered by the equipment, then the school shall blank these spaces so that the images will not be recorded.
4. The employees and students will be made aware of the purpose(s) for which the scheme has been established and notices to this effect will be displayed in the school reception area and at the entrance to the Reconciliation Centre. Parents will be informed through the school website.
5. The operators will only use the equipment in order to achieve the purpose(s) for which it has been installed.
6. Cameras that are adjustable by the operators will not be adjusted or manipulated by them to overlook spaces which are not intended to be covered by the scheme, other than as described in 7 below.
7. If it is not possible physically to restrict the equipment to avoid recording images from those spaces not intended to be covered by the scheme, then operators will be trained in recognising the privacy implications of such spaces being covered.
8. Signs, of no less than the minimum standard, will be placed so that the public are aware that they are entering a zone that is covered by CCTV.
9. Internal cameras are located in general circulation areas.

Operation of the System

The CCTV system will be administered and managed by the Senior Operations Manager, in accordance with the CCTV Code of Practice. The day-to-day management will be the delegated responsibility of the Senior Operations Manager, Student Support Officers and Reception Staff.

The CCTV system will operate 24 hours each day, every day of the year, recording all activity.

Use of Audio

Audio recording is recognised as more intrusive than visual CCTV and is therefore used only where it is necessary, proportionate and lawful, in line with the Data Protection Act 2018, UK GDPR and the Surveillance Camera Code of Practice.

An audio-enabled CCTV camera is installed in the Reception area only. The purpose of audio recording is to support safeguarding, protect staff and visitors, and assist in the prevention and investigation of serious incidents, including threatening, abusive or aggressive behaviour. Audio is not monitored live and will only be accessed where there is a clear, justified and documented reason, such as a safeguarding concern, complaint, or formal investigation.

The school has completed a Data Protection Impact Assessment (DPIA) which confirms that the use of audio recording in Reception is necessary and that no less intrusive measure would adequately meet the intended purpose. Clear signage is prominently displayed in Reception to inform staff, visitors and contractors that audio and visual recording is in operation.

The use of audio recording is subject to the following safeguards:

- Audio recording is restricted to the Reception area only
- It is not used routinely and is not used for staff performance management
- It is never installed in private or sensitive areas
- Access is limited to authorised senior staff only, and all access is logged

Audio recordings are stored securely and retained for the same period as CCTV footage (approximately 14 days), unless required for safeguarding, investigatory or legal purposes, in which case recordings will be retained only for as long as necessary.

Access to Recorded Images

Access to the recorded images is restricted to designated members of staff some of whom will also have the authority to decide whether to allow requests for access from other individuals. See **Appendix A** for details.

Viewing of the recorded images should take place in a restricted area, for example, in the Senior Operations Manager or Student Support Office. Other employees, other than those involved in any investigation, will not be allowed to have access to that area when a viewing is taking place.

All operators and employees with access to images should be aware of the procedure that needs to be followed when accessing the recorded images.

All operators should be trained in their responsibilities under the Code of Practice, i.e. they should be aware of:

- The user's security policy e.g. procedures to have access to recorded images;
- The user's disclosure policy

There are three CCTV viewing systems in the school; in the Student Support offices Year 9 and year 11 and on Reception. There is also remote access for Senior Operations Manager. All are password protected and only authorised staff have passwords to gain access to recorded images.

Access to Live Images

Monitors displaying images from areas in which individuals would have an expectation of privacy should not be viewed or be capable of being viewed by anyone other than authorised persons.

Viewing of live images should only be carried out when there is a suspicion that improper conduct may be carried out at a particular time.

The privacy of staff and students going about their normal legitimate business must be respected at all times.

Quality of Images and Storage of Recorded Material

1. Upon installation an initial check will be undertaken to ensure that the equipment performs properly. Regular checks will be made thereafter to ensure that the system is operating properly.
2. Images are retained on a hard disc drive for a period of approximately 14 calendar days. Actual retention times will depend on the volume of activity. Copies can be made for investigation purposes.
3. Checks will be made to ensure the accuracy of any features such as the location of the camera and/or date and time reference. Where the time/date etc are found to be out of sync with the current time/date, the operators will take such remedial action as is continued in the operations manual to correct the error. School Network Manager will support where required.
4. Cameras will only be situated so that they will capture images relevant to the purpose for which the scheme has been established.
5. When installing cameras, consideration will be given to the physical conditions in which the cameras are located.
6. Cameras will be properly maintained and serviced to ensure that clear images are recorded. Servicing will be carried out at least annually.
7. Where required, cameras should be protected from vandalism in order to ensure that they remain in working order.
8. A maintenance log will be kept.

9. The school's Site Staff will be:

- Responsible for making arrangements for ensuring that a damaged camera is fixed
- Ensuring that the camera is fixed within a specific time period
- Monitoring the quality of the maintenance work

10. Once the retention period has expired, the images will be removed or erased.

11. Images that are to be retained for evidential purposes will be retained in a secure place to which access is controlled.

Access to and disclosure of images to third parties

1. Access to recorded images will be restricted to those persons who need to have access in order to achieve the purpose(s) of using the equipment.

2. Disclosure of the recorded images to third parties should only be made in limited and prescribed circumstances. Subject to paragraph 1 above, in disclosure will be limited to the following classes of persons/agencies.

- Law enforcement agencies, where the images recorded would assist in a specific enquiry;
- Highways authorities in respect of traffic management matters;
- Law enforcement agencies where the images would assist a specific criminal enquiry;
- Prosecution Agencies;
- Relevant legal representatives

3. All requests for access or for disclosure should be recorded, if access or disclosure is denied, the reason should be documented.

4. If access to or disclosure of the images is allowed, then the following will be documented. (**Appendix B**)

- The date and time at which access was allowed or the date on which disclosure was made
- The identification of any third party who was allowed access or to whom disclosure was made
- The reason for allowing access or disclosure
- Location of the images
- Any crime incident number to which images may be relevant
- Signature of person authorised to collect the medium – where appropriate.

5. Recorded images will not be made more widely available – for example they should not be routinely made available to the media or placed on the Internet.

6. If it is intended that images will be made more widely available, that decision should be made by the Headteacher and the reason for that decision should be documented.
7. Images will not be disclosed to the media. Where images are disclosed for authorised reasons (other than to the media or in the circumstances as outlined above), the images of individuals will need to be disguised or blurred so that they are not readily identifiable.

Maintenance

The CCTV systems in school are maintained by VPS Solutions Ltd.

Breaches of the policy (including breaches of security)

The Headteacher, or senior leader acting on his behalf, will initially investigate any breach of the CCTV policy by school staff. Any serious breach of the policy will be subject to disciplinary procedures.

Access by Data Subject

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about them, including those obtained by CCTV. Requests for Data Subject Access should be made through the Senior Operations Manager.

In accordance with Section 7 of the Data Protection Act 2018 (Subject Access), an individual who believes that their image has been captured by this scheme is entitled to make a written request to the Data Controller. Upon payment of the current fee*, and the supply of essential information, a systems search will be conducted and subject to certain conditions, the individual will be allowed access to the personal data held (The current maximum fee is £10.00 and may be reviewed)

All subject access requests should be referred in the first instance to the Senior Operations Manager who will liaise with the Headteacher.

All staff involved in operating the equipment must be able to recognise a request for access to recorded images by data subjects and how such requests are to be dealt with.

Data subjects should be provided with a standard subject access request form, a copy of this form is attached (**Appendix C**).

The above form will also enquire whether the individual would be satisfied with merely viewing the images recorded. The form will also indicate that the response will be provided promptly and in any event within 40 days of receiving.

Individuals, at the time of any subject access request, will be given a description of the type of images recorded and retained and the purpose for which the recording and retention takes place. They should be informed of their rights as provided by the 2018 Act.

Prior to any authorised disclosure, the Headteacher will need to determine whether the images of another “third party” individual features in the personal data being applied for and whether these third party images are held under a duty of confidence.

If third party images are not to be disclosed the third party images will be disguised or blurred.

If the Headteacher decides that a subject access request from an individual is not to be complied with, the following should be documented:

- The identity of the individual making the request
- The date of the request
- The reason for refusing to supply the images requested
- The name and signature of the person making the decision

Complaints

Any complaints about the schools’ CCTV system should be addressed to the Headteacher and a copy of the schools complaint policy can be found on the school website.

Staff authorised to operate CCTV System

The Senior Operations Manager, Senior Leadership Team, Head of Years, Pastoral team and Reception Staff are the only staff who have permission to operate the CCTV system.

Staff authorised to view CCTV footage / still images

Those authorised to operate the system (listed above) are the only members of staff permitted to view CCTV footage or still pictures. Persons not named above must seek authorisation from a member of SLT. This includes all members of staff and police officers. The Police are able to use footage for evidence following an incident providing prior permission has been agreed with a member of SLT.



Appendix B

St Thomas More Catholic Academy

C.C.T.V. - Recording of Viewing by Third Party (e.g. Police)

Date and Time Access Allowed:

Date	Time

Identification of any third party who was allowed access:

Names of school staff present:

Reason for allowing access:

Crime incident number if applicable:

Location of the images:

Signature of the person authorised to collect the medium – where appropriate:

Date and time copy created for evidential purposes:

Date	Time

Appendix C

St Thomas More Catholic Academy

C.C.T.V. – Form to Request Access to CCTV Images – Fee £10.00

Name: _____

Address: _____

Telephone Number: _____

Date of Birth: _____

Date image recorded: _____

Time image recorded: _____

To carry out a search for the images, a fee of £10.00 will be charged.

Please complete the above form and attached a cheque for £10.00 made payable to All Saints Catholic Collegiate.

The Headteacher will consider the request and respond within 28 days.

Location of Cameras

Number on Map	External	Type	Direction
E01	Main Vehicle Gates	Fixed	Towards main gate
E02	Pedestrian Gate	Fixed	Towards pedestrian gate
E03	School House Rear	Fixed	Overlooking path to back entrance of the House towards car park
E04	Front of Music Block	Fixed	Corner of music block towards pedestrian gate
E05	Music Entrance	Fixed	Towards music block entrance and covered RE walkway
E06	Chapel Entrance	Fixed	Facing Chapel yard area towards Angel's Walkway
E07	Toilet Block	Fixed	External camera facing toilet block entrance (no privacy block required as only captures entrance doors to toilet block)
E08	Amphitheatre	Fixed	Overlooking Amphitheatre towards Savio Centre
E09	Angels Walkway	Fixed	Facing AW towards Maths block entrance
E10	Angels Walkway Topside	Fixed	Facing Old Science Block and Recon Block
E11	Recon Entrance	Fixed	Facing Reconciliation entrance yard area towards Angel's Walkway
E12	Gym Area	Fixed	Towards PE entrance and Maths block entrance
E13	Angel Walkway to Yard	Fixed	Facing Geography Block and Angels Walkway Exit to Yard
E14	Science Middle Entrance	Fixed	Facing lower yard area towards Geography block
E15	New Science Rear Fencing	Fixed	Facing grass area at end of science block towards fence
E16	New Science Block Top Exit	Fixed	End of science block towards back corner of Yard
E17	Main Yard	Fixed	Facing main Yard towards sports hall
E18	Side Sports Hall Main Yard	Fixed	Facing side of sports hall towards sports fields
E19	Rear Sports Hall facing Tennis	Fixed	Facing back of sports hall towards tennis courts
E20	Sports Hall Storage Area External	Fixed	Facing back of D&T block & Sports Hall
E21	Sports Entrance Area	Fixed	Corner of maths block facing D&T block (rooms 162,165,167)
E22	3G from Woodwork	Fixed	Facing 3G Pitch Directly across from the D&T Workshop

E223	Woodwork & 3G	Fixed	Looking down D&T towards 3G Pitch
E24	3G Car Park Entrance Gates	Fixed	Facing double vehicle gates from staff car park to behind school.
E25	Hatch External	Fixed	Facing small yard area between D&T block and kitchen
E26	3G Pedestrian Gate	Fixed	Facing 3G Entrance Gate and Car Park
E27	Auditorium Exit	Fixed	Facing Boiler Room and Kitchen External Exit
E28	Staff Car Park	Fixed	Towards 3G Pitch and bike stand
E29	Main Entrance	Fixed	Along front of building access doors

Number on Map	Ground Floor - Internal	Type	Direction
I01	School House Entrance	Fixed	Facing towards Back door Of House
I02	Music Corridor	Fixed	Facing Music Office and Rooms 131 & 130
I03	Reception Foyer	Fixed	Facing Visitor Entrance
I04	Visitor Waiting	Fixed	Facing Visitor Waiting Area
I05	Admin Kitchen	Fixed	Facing Admin Kitchen and Boardroom
I06	SLT Corridor	Fixed	Facing Offices towards Admin Kitchen Area
I07	Student Services	Fixed	Overlooking lobby and facing dining room entrance doors
I08	R.E Corridor	Fixed	Facing Rooms 120 & 121
I09	Chapel Stairs	Fixed	Facing up stairwell from RE to 6 th Form
I10	Chapel Foyer	Fixed	Facing entrance doors towards Chapel
I11	FTI Classroom	Fixed	Facing Classroom
I12	Old Science Corridor	Fixed	Facing Old Science Corridor towards rooms 116 and 117
I13	Recon Corridor	Fixed	Facing entrances to reconciliation towards new science
I14	New Science Entrance Corridor	Fixed	Towards new science entrance door and lobby area
I15	New Science Classroom Corridor	Fixed	Looking down new science corridor towards rooms 103 & 104
I16	P.E Corridor	Fixed	Facing towards Gym Internal Entrance
I17	Rear Stairs Ground Floor	Fixed	Facing exit to PE block
I18	Rear Entrance Ground Floor	Fixed	Towards exit at end of maths block
I19	Maths Ground Floor	Fixed	Facing rooms 141&143
I20	Main Stairs Ground Floor	Fixed	Towards exit of main block onto Angel's Walkway
I21	Lift Ground Floor	Fixed	Facing lift door towards staff room
I22	Staff Room Corridor	Fixed	Facing staff room towards admin block
I23	Staff Room Corridor	Fixed	Facing staff room towards Maths block
I24	English Stairs	Fixed	Bottom of English stairwell facing entrance to inner lobby
I25	Student Services	Fixed	Overlooking Student Services lobby
I26	Dining Hall Entrance	Fixed	Above student entrance door, facing Auditorium doors
I27	Cold Serving Counter	Fixed	Overlooking cold serving area
I28	Hot Serving Counter	Fixed	Overlooking hot serving area

I29	Dining Hall	Fixed	Overlooking dining room and facing towards hot serving area
I30	Auditorium Front	Fixed	Facing towards the Tiered Seating
I31	Auditorium Rear	Fixed	Facing towards Screen and Projectors
I32	Dining Hall Entrance	Fixed	Overlooking hall from above internal entrance doors
I33	Student Entrance	Fixed	Within student entrance foyer
Number on Map	First Floor - Internal	Type	Direction
I34	Library	Fixed	Towards lower seating area at front of school
I35	Library Breakout	Fixed	Facing Library Book Check in Desk.
I36	Sixth Form Rear Stairs Area	Fixed	Facing entrance to MFL Form from emergency exit stairwell and down to 6 th Form entrance
I37	Sixth Form Rear	Fixed	Facing entrance from stairwell towards 6 th Form study area
I38	Main Landing to 6 th Form	Fixed	Towards 6 th Form entrance and English
I39	English Corridor	Fixed	Facing room 247, top of stairwell and corridor
I40	IT Stairs First Floor	Fixed	Cover IT Suite Back Stairs and entrance from English Corridor
I41	Middle Stairs First Floor	Fixed	Looking up and down stairwell
I42	Lift Area First Floor	Fixed	1st Floor Lift Area & SSO Year 11 Office
I43	English Classroom First Floor	Fixed	Facing rooms 241 & 243
I44	English Corridor First Floor	Fixed	End corridor Towards rooms 240 - 243
I45	Rear Stairs First Floor	Fixed	End corridor stairs
Number on Map	Second Floor	Type	Direction
I46	History Corridor	Fixed	Facing Rooms 323 & 324
I47	IT Suite Stairs	Fixed	Facing up and down IT stairwell
I48	Middle Stairs Second Floor	Fixed	Central Stairs Top Floor
I49	Lift Area Second Floor	Fixed	Top Floor Lift Area
I50	Maths Classroom Second Floor	Fixed	Towards rooms 341 & 343
I51	Maths Corridor Second Floor	Fixed	End corridor facing towards rooms 340-343
I52	Rear Stairs Second Floor	Fixed	End corridor stairwell and landing

New camera additions March 2018

New Camera additions April 2020

New Camera Additions April 2023

New Camera Additions April 2026