

Les Quennevais School

CCTV Policy

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1. POLICY STATEMENT

Les Quennevais School uses Close Circuit Television (“CCTV”) throughout the building internally and externally. A comprehensive list of all installations is appended to this Policy.

2. PURPOSE

This policy sets out the position of the school in relation to its use of CCTV, its management, operation and use.

The policy applies to all members of the school – staff, students, visitors and all other persons whose images may be captured by the CCTV system.

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

- Data Protection (Jersey) Law 2018
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights (Jersey) Law 2000

3. USE OF CCTV

CCTV systems are installed externally and internally on the premises for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external and internal environs of the premises during both the daylight and night hours each day.

CCTV surveillance at the School is intended for the purpose 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.

4. DESCRIPTION OF SYSTEM

The School uses fixed cameras only. Cameras are not equipped to record audio.

5. GENERAL PRINCIPLES

The School as the corporate body has a statutory responsibility for the protection of its property, equipment and other plant as well as providing a sense of security to its employees, students and invitees to its premises. 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 Teacher. Any requests for CCTV recordings/images from Police will be fully recorded and legal advice will be sought if any such request is made. (See "Access" below). If a law enforcement authority, such as Jersey Police, are seeking a recording for a specific investigation, this may require a warrant and accordingly any such request made by Jersey Police should be requested in writing and the school will immediately seek legal advice.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other 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/ETB or a student attending one of its schools/centres. All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by Les Quennevais 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 and GDPR 2018.

6. 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 Springfield 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 board of management. 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, e.g. hallways, stairwells, locker areas, toilet blocks, the Headteacher 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.

7. LOCATION OF CAMERAS

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. Les Quennevais School has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals. Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property. Cameras will be positioned in prominent positions where they are clearly visible to all persons. There will be no deliberately covert cameras.

CCTV Video Monitoring and Recording of Public Areas in Les Quennevais School may include the following:

- **Protection of school buildings and property:** The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, receiving areas for goods/services
- **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
- **Video Patrol of Public Areas:** Parking areas, Main entrance/exit gates, Traffic Control
- **Criminal Investigations (carried out by Jersey Police):** Robbery, burglary and theft surveillance

8. COVERT SURVEILLANCE

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

9. NOTIFICATION – SIGNAGE

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

10. 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. A data controller needs to be able to justify this retention period. For a normal CCTV security system, it would be difficult to justify retention beyond a month (31 days), except where the images identify an issue – such as a break-in or theft and those particular images/recordings are retained specifically in the context of an investigation/prosecution of that issue.

Accordingly, the images captured by the CCTV system will be retained for a maximum of 31 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Principal. The Principal may delegate the administration of the CCTV System to another staff member. In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above (such individuals may include the Jersey Police, the Deputy Head, the relevant Year Head, other members of the teaching staff, representatives of the Department of Education and Skills, representatives of the HSE and/or the parent of a recorded student). When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

Access will be restricted to authorised personnel.

11. ACCESS

The CCTV systems will be managed by the Business and Facilities Manager

Access to the CCTV system and stored images will be restricted to authorised personnel only. On a day to day basis the CCTV system will be operated by the Site Team.

The viewing of live CCTV images will be restricted to authorised members of staff with explicit powers to view images, for the reasons set out above.

Recorded images which are stored by the CCTV system will be restricted to access by the Business and Facilities Manager, Site Team and SLT, for the reasons set out above.

No other individuals will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.