

CCTV Policy

St John's College, Cardiff

CCTV POLICY

This policy applies to all sections of the School:

Sixth Form, Senior School, Junior School,
Infant School & Nursery.

Version: September 2025

The main legislation in this area is the General Data Protection Act 2018 and the Education (Independent School Standards) Regulations 2014. Other legislation not directly relevant to independent schools, but applicable to general principles, include the Regulation of Investigatory Powers Act 2000 and the Protection of Freedoms Act 2012.

Relevant guidance which has informed this Policy includes:

- *The ICO Code of Practice on Privacy Notices*
- *The ICO Guide to Privacy Notices under GDPR*
 - *The ICO Code of Practice on CCTV*
 - *The ICO Guide to Data Protection*
- *The ICO Guide to the General Data Protection Regulation*
- *The Government's Surveillance Camera Code of Practice*

(the latter is only directly applicable to public authorities but is intended to be good practice in the private sector).

1. Purpose

- 1.1** The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at St John's College, Cardiff (the **School**) at the School's main site and sports pavilion site.
- 1.2** It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the School and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the **System**).
- 1.3** The System is administered and managed by the School in respect of the main school site and the sports pavilion site, who act as the Data Controller. This policy will be subject to review from time to time and should be read with reference to the School's Privacy Statement (accessible <https://www.stjohnscollegecardiff.com/userfiles/sjccmvc/documents/01-about/Policies%20%26%20Handbooks/2023-24/St%20John's%20College%20Privacy%20Statement%20-%20Parents%20and%20Pupils%202023-24.pdf>).
- 1.4** For further guidance, please review the Biometric and Surveillance Commissioner's Surveillance Camera Code of Practice (accessible <https://www.gov.uk/government/publications/update-to-surveillance-camera-code/amended-surveillance-camera-code-of-practice-accessible-version>).
- 1.5** All fixed cameras are in plain sight on the School's main site and sports pavilion site and the School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds.
- 1.6** CCTV cameras are currently in use at the main site and the sports pavilion and these are controlled by St John's College, Cardiff. CCTV Cameras are also in use at Eastern Business Park and these cameras are controlled by the landlord of Eastern Business Park.
- 1.7** ANPR (Automatic Number Plate- Recognition) is not in use on the School's main site and the School's sports pavilion site. Eastern Business Park has confirmed that ANPR is not in use on their site.
- 1.8** The School's purposes of using the System are set out below and, having fully considered the privacy rights of individuals, the School believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

2. Objectives of the System on the main school site and the sports pavilion site

- 2.1** To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 2.2** To protect the School buildings and equipment and the personal property of pupils, staff, volunteers, visitors and members of the public.
- 2.3** To support the police and community in preventing and detecting crime and assist in the identification and apprehension of offenders
- 2.4** To monitor the security and integrity of the School site and deliveries and arrivals, including car parking.
- 2.5** To monitor staff and contractors when carrying out work duties.
- 2.6** To monitor and uphold discipline among pupils in line with the Behaviour, Rewards and Sanctions Policy (accessible <https://www.stjohnscollegedcardiff.com/userfiles/sjccmvc/documents/01-about/Policies%20%26%20Handbooks/2023-24/Behaviour%2C%20Rewards%20%26%20Sanctions%20Policy%20-%20Junior%20School%202023-24.pdf>).

3. Positioning of the System on the main school site and the sports pavilion site

- 3.1** Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.
- 3.2** Adequate signage has been placed in prominent positions to inform pupils, staff, volunteers, visitors and members of the public that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the System.
- 3.3** No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- 3.4** No images of public spaces will be captured except to a limited extent at site entrances.

4. Maintenance of the System on the main school site and the sports pavilion site

- 4.1** The CCTV System will be operational 24 hours a day, every day of the year.
- 4.2** The System Manager (defined below) will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
- 4.3** The System will be checked and, to the extent necessary, serviced no less than annually.

5. Supervision of the System on the main school site and the sports pavilion site

- 5.1** Staff authorised by the School to conduct routine supervision of the System may include the Director of Estates, day/night security, and relevant staff on duty.
- 5.2** Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of, or opportunity for, access to unauthorised persons.

6. Storage of Data on the main school site and the sports pavilion site

- 6.1** The day-to-day management of images will be the responsibility of the Director of Estates who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.
- 6.2** Images will be stored for approximately 30 days and automatically overwritten unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.
- 6.3** Where such data is retained, it will be retained in accordance with the Data Protection Act 2018 and our Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded in the System log book.

7. Access to Images on the main school site and the sports pavilion site

- 7.1** Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, in pursuance of the above objectives or if there is some other overriding and lawful reason to grant such access.
- 7.2** Individuals also have the right to access personal data the School holds on them (please see the School's Privacy Statement), including information held on the System, if it has been kept. The School will require specific details including at least the time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances, where others are identifiable.
- 7.3** The System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the System and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV images:
 - 7.3.1** Where required to do so by the Headteacher, the Police or some relevant statutory authority;
 - 7.3.2** To make a report regarding suspected criminal behaviour;
 - 7.3.3** To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
 - 7.3.4** To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian will be informed as part of the School's management of a particular incident;
 - 7.3.5** To data subjects (or their legal representatives) pursuant to an access request under the Data Protection Act 2018 and on the basis set out in **7.2** above ;
 - 7.3.6** To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
 - 7.3.7** In any other circumstances required under law or regulation.
- 7.4** Where images are disclosed under **7.3** above a record will be made in the System log book, including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).
- 7.5** Where images are provided to third parties under paragraph **7.3** above wherever practicable, steps will be taken to obscure images of non-relevant individuals.

8. Other CCTV Systems

- 8.1** The School does not own or manage third party CCTV systems, but may be provided with images of incidents by third parties where this is in line with the objectives of the School's own CCTV policy.
- 8.2** Many pupils travel to School on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The School may use these in establishing facts in cases of unacceptable pupil behaviour, in which case the parents/guardian will be informed as part of the School's management of a particular incident.
- 8.3** Automatic Number Plate Recognition systems are not in use at the School.
- 8.4** Eastern Business Park, the site where the School's Sixth Form Centre is based, owns and manages its own CCTV systems. On 4th July 2024 Eastern Business Park confirmed the following:
- CCTV cameras are on view;
 - there are no hidden CCTV apart from miniature CCTV cameras above the tills in the canteen;
 - there is no ANPR in operation on the site.

Should you have any queries regarding CCTV at Eastern Business Park then please address these to The Facilities Manager, Eastern Business Park, Wern Fawr Lane, Cardiff CF3 5EA.

9. Complaints and Queries regarding the main school site and the sports pavilion site

- 9.1** Any complaints or queries in relation to the School's CCTV system or its use of CCTV should be referred to the Director of Estates.
- 9.2** Any requests for copies of CCTV footage should be referred to the Data Protection Coordinator.
- 9.3** A copy of the School's CCTV Footage Data Access Request form for the main site and the sports pavilion site can be found in Appendix 1.
- 9.4** For any other queries concerning the use of your personal data by the School, please see the School's Privacy Statement.

APPENDIX 1

CCTV FOOTAGE ACCESS REQUEST REGARDING THE MAIN SCHOOL SITE AND THE SPORTS PAVILION SITE

The following information is required before the School can provide copies of or access to CCTV footage from which a person believes they may be identified.

Please note that CCTV footage may contain the information of others that needs to be protected, and that the school typically deletes CCTV recordings after a 4-week period.

Name and address: <i>(proof of ID may be required)</i>	
Description of footage <i>(including a description of yourself, clothing, activity etc.)</i>	
Location of camera	
Date of footage sought	
Approximate time <i>(give a range if necessary)</i>	

Signature*

Print Name.....

Date

*** NB if requesting CCTV footage of a child of Nursery/Infant/Junior school age, according to school policy, a person with parental responsibility should sign this form. For children at secondary school, the child's authority or consent must be obtained except in circumstances where that would clearly be inappropriate and the lawful reasons to provide to the parent(s) outweigh the privacy considerations of the child.**