

# CCTV Policy

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Bishop's Hatfield Girls' School. 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). The System is administered and managed by the School, which acts 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 Notice(s) and Online Security Policy. For further guidance, please review the Information Commissioner's CCTV Code of Practice.

All fixed cameras are in plain sight on the School premises and the School does not routinely use CCTV for covert monitoring. The School's purposes of using the CCTV 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.

## 1. Objectives of the System

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety and the School's safeguarding responsibilities.
- To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- To monitor the security and integrity of the School site and deliveries and arrivals.
- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the School Rules, which are available to parents and pupils on request.

## 2. Positioning

- Locations have been selected by Interserve Construction Ltd to meet the requirements specified by the Education and Skills Funding Agency under the building contract.
- The locations allow sight of the School's entrances which deliver the monitoring requirements to address the stated objectives.
- Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area.
- No images will be captured from areas in which individuals would have a heightened expectation of privacy.
- No images of public spaces will be captured except to a limited extent at the main site entrance.

## 3. Maintenance

- The CCTV System will be operational 24 hours a day, every day of the year.
- The Facilities Manager or Facilities Co-ordinator will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
- The System will be checked and (to the extent necessary) serviced no less than annually and such servicing will be provided by Interserve Facilities Management under the service contract with the Education and Skills Funding Agency.

#### **4. Supervision of the System**

- Staff authorised by the School to conduct routine supervision of the System may include members of the Site Team, Leadership Team and the onsite IT Engineer (an RM Education employee).
- 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.

#### **5. Storage of Data**

- The day-to-day management of images will be the responsibility of IT Support which is delivered through RM Education.
- Images are stored for approximately five months, 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.
- Where such data is retained, it will be retained in accordance with the relevant legislation 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.

#### **6. Access to Images**

- Access to stored CCTV images will only be given to authorised persons, under the supervision of the Facilities Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
- Individuals have the right to request access to the personal data the School holds on them (please see the Data Protection Policy), including information held on the System, if it has been kept. The School will require the individual to complete a CCTV Access Request Form (see Appendix) which should be sent to the Data Protection Officer at the school. This right is subject to exemptions from access, including circumstances where others are identifiable.
- The Facilities Manager must be satisfied 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 Manager may authorise access to CCTV images:
  - Where required to do so by a member of the Senior Leadership Team, the Police or some relevant statutory authority;
  - To make a report regarding suspected criminal behaviour;
  - To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
  - To assist the School in establishing facts in cases of unacceptable pupil behaviour, management of a particular incident;
  - To data subjects (or their legal representatives) pursuant to an access request under relevant legislation and on the basis set out in above;
  - To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
  - In any other circumstances required under law or regulation.
- When disclosed, 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).
- Where images are provided to third parties, wherever practicable, steps will be taken to obscure images where images are of non-relevant individuals.

## **7. Other CCTV systems**

- Third parties may provide the School with images of incidents where this is in line with the objectives of the School's own CCTV policy and/or other policies such as the Code of Conduct.
- Some pupils travel to School on coaches provided by third party contractors and these coaches may be 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. The same applies to school trips.

## **8. Complaints and queries**

- Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Data Protection Officer.

## CCTV SUBJECT ACCESS REQUEST

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's system automatically overwrites recordings after 5 months.

Name:	
Address:	
Proof of identity is essential, please record documents provided:	
Description of footage (description of clothing, activity and whether arriving or leaving the building):	
Location of camera:	
Date of footage:	
Approximate time of footage:	
If the request is for a minor, please provide your name and relationship:	

Signature of subject\*: \_\_\_\_\_

Date: \_\_\_\_\_

\* if requesting CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 or over, 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.