



PREP
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Policy 6.14

Closed Circuit Television (CCTV) Policy

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Kitebrook Preparatory School Policy 6.14 Closed Circuit Television (CCTV) Policy

PART 1: DATA PROTECTION POLICY FOR STAFF

1 This policy is the responsibility of the Head of Operations to review and update annually.

2 SCOPE

- 2.1 The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Kitebrook Preparatory School (hereafter 'the 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).
- 2.2 The System is administered and managed by the School, who act as the 'Data Controller'. This policy will be reviewed by point 1, and should be read with reference to the School's Privacy Notice. Further guidance, can be reviewed in the Information Commissioner's CCTV Code of Practice (accessible <https://www.gov.uk/government/publications/surveillance-camera-commissioner-privacy-information-notice>)
- 2.3 All fixed cameras are located in plain sight on the School premises. The School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School Estate. Currently cameras cover external entrances to the main School buildings.
- 2.4 All staff are required to read and confirm that they understand this policy by marking their name on the CPD Staff Sheet.

3 Justification & Objectives

- 3.1 The School's purpose of using the CCTV system is set out below. Consideration for the privacy and the rights of individuals, the School believes these purposes are all legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

4 Objectives of the System

- 4.1 To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 4.2 To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- 4.3 To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- 4.4 To monitor the security and integrity of the School site, associated deliveries and arrivals, and car parking.
- 4.5 To monitor staff and contractors when carrying out work duties.
- 4.5 To monitor and uphold discipline among pupils in line with the School's Code of Conduct and other policies, which are available to parents and pupils on request.

5	<p>Positioning</p> <p>5.1 Locations have been selected based on locations that the School reasonably believe requires monitoring as per point 4.</p> <p>5.2 Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.</p> <p>5.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.</p>
6	<p>Supervision of the System</p> <p>6.1 Point 1 details who is responsible for the day-to-day management of images and will act as the System Manager, or such suitable person as the System Manager or Head shall appoint in their absence.</p> <p>6.2 Staff authorised by the School to conduct routine supervision of the System may include, but are not limited to, the Head of Operations, Director of IT, members of the Safeguarding Team and other members of Senior Leadership.</p> <p>6.3 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. Point 9.1 details this process.</p>
7	<p>Storage of Data</p> <p>7.1 Images will be stored for approximately 3 weeks, and automatically over-written 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.</p> <p>7.2 Where such recordings are exported, they will be retained in accordance with the General Data Protection Regulation (GDPR 2018) and our Data Protection Policy. Appendix 1 will be completed and will be recorded in the system log book.</p> <p>7.3 The system log will be stored with the Head of Operations.</p>
8	<p>Maintenance</p> <p>8.1 The CCTV System will be operational 24 hours a day, every day of the year.</p> <p>8.2 Point 1 details who the person will check and confirm that the System is properly recording and cameras are functioning correctly, on a regular basis.</p> <p>8.3 The System will be checked and (to the extent necessary) serviced no less than annually.</p>
9	<p>Access to Images</p> <p>9.1 Access to stored CCTV images will only be given to authorised persons identified as such by the Head or Head of Operations. The imagery will be provided under the supervision of the Head, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).</p> <p>9.2 Individuals have the right to access personal data the School holds on them (please see the School's Privacy Notice and Data Protection Policy), if it has been kept. The School will require the person to complete</p>

Appendix 1. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

9.3 Point 1 must satisfy the identity of any person wishing to view stored images or access the system and the legitimacy of the completed Appendix 1. All requests are subject to 9.1. The following are examples when the System Manager may authorise access to CCTV images:

9.3.1 Where required to do so by the Head, Head of Operations, the Police or some relevant statutory authority;

9.3.2 To make a report regarding suspected criminal behaviour;

9.3.3 To enable the Designated Safeguarding Lead or their appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;

9.3.4 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;

9.3.5 To data subjects (or their legal representatives) pursuant to an access request under General Data Protection Regulation;

9.3.6 To the School's insurance company where required in order to pursue a claim for damage done to insured property; or

9.3.7 In any other circumstances required under law or regulation.

10 Other CCTV systems

10.1 The School does not own or manage third party CCTV systems, but may be provided by third parties with images of incidents where this is in line with the objectives of the School's own CCTV policy.

11 Complaints and queries

11.1 Any complaints should follow the School's Complaints Policy. Any queries in relation to the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to the person details in Point 1 (datacompliance@kitebrookpst.org)

11.2 For any other queries concerning the use of your personal data by the School, please see the School's applicable Privacy Notice

CCTV FOOTAGE 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 typically deletes CCTV recordings after 3 weeks.

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

Signature*

Print Name

Date

*** NB if requesting CCTV footage of a child (under 12/13), a person with parental responsibility must sign this form. For children over 13, 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.**