



## CCTV Policy

### Important Note

Unless otherwise stated, all Policies of St Hilda's School apply to the school in its entirety. This comprises all staff and pupils in the Early Years Foundation Stage (EYFS), the Junior School (Key Stage 1) and the Senior School (Key Stage 2).

**REVIEW DATE:** January 2020

**REVIEWED BY:** Dan Sayers (Headmaster)

**SIGNED:**

*Dan Sayers*

**DATED:** 29.01.20

### INTRODUCTION

As individuals we want to know that personal information about ourselves is handled properly. We and others have specific rights in this regard. In the course of its activities St Hilda's School collects, stores and processes personal data. The school recognises that the correct and lawful treatment of this data will maintain confidence in its organisation and is of importance to its successful operation.

The types of personal data that the school may be required to handle includes information about current, past and prospective employees, parents, pupils and others with whom it communicates. The personal data, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the General Data Protection Regulations 2018 ("GDPR") and other regulations. GDPR imposes restrictions on how the school may process personal data. The school recognises that a breach of GDPR could give rise to criminal sanctions as well as bad publicity.

### PURPOSE OF POLICY

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at St Hilda's School (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**).

The System is administered and managed by the School, 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 and



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Records Management Policy. For further guidance, please review the Information Commissioner's CCTV Code of Practice (accessible here <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>)

All fixed cameras are in plain sight on the School premises and the School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds.

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.

### OBJECTIVES OF THE SYSTEM

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 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: **to me this sounds a little draconian. Could this be removed?**

### POSITIONING

Locations have been selected, both inside and out, that the School reasonably believes require monitoring 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, including changing and washroom facilities.

No images of public spaces will be captured except to a limited extent at site entrances.



## **MAINTENANCE**

The CCTV System will be operational 24 hours a day, every day of the year.

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.

The System will be checked and (to the extent necessary) serviced no less than annually.

## **SUPERVISION OF THE SYSTEM**

Staff authorised by the School to conduct routine supervision of the System may include the Business Manager, Caretaker and Headteacher.

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. This is not the case; the office is neither secure nor private. Should we say... CCTV monitors are located in the Main Office.

## **STORAGE OF DATA**

The day-to-day management of images will be the responsibility of the Business Manager who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.

Images will be stored for 4 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.

Where such data is retained, it will be retained in accordance with GDPR and our Privacy and Records Management 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.

## **ACCESS TO IMAGES**

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).

Individuals also have the right to access personal data the School holds on them (please see the Privacy and Records Management Policy), including information held on the System, if it has been kept. The School will require specific details including at least to 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.



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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:

- Where required to do so by the Head, 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, in which case, the parents/guardian will be informed as part of the School's management of a particular incident;
- To data subjects (or their legal representatives) pursuant to an access request under GDPR and on the basis set out in 6.2 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.

Where images are disclosed under 6.3 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).

Where images are provided to third parties under 6.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

## **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 Business Manager.

## **WHO IS COVERED BY THE POLICY**

This policy covers all those registered at the school as pupils, and all individuals employed by the school, irrespective of their status, level or grade. It therefore includes members of the Senior Management Team, Heads of Departments, teaching staff, non-teaching staff, part-time or fixed-term employees, Peripatetic staff and volunteers (collectively referred to as employees in this policy).



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### STATUS OF THE POLICY

This policy has been approved by the school's Board of Governors. It sets out the school's rules on data protection and the eight data protection principles contained in it. These principles specify the legal conditions that must be satisfied in relation to the obtaining, handling, processing, transportation and storage of personal data.

The Headmaster is responsible for ensuring compliance with GDPR and with this policy. Any questions or concerns about the interpretation or operation of this policy should be taken up in the first instance with the Headmaster.

This policy is not part of the contract of employment of any employee and the school may amend it at any time. However, it is a condition of employment that employees and others who obtain, handle, process, transport and store personal data will adhere to the rules of the policy. Any breach of the policy will be taken seriously and may result in disciplinary action.

Any employee who considers that the policy has not been followed in respect of personal data about themselves or others should raise the matter with the school's Data Protection Compliance Manager in the first instance.

**This policy will be reviewed annually, by the Senior Management Team, in line with the school's review schedule for policies.**



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### 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 a 4 week period.

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)	

Signature\* .....

Print Name.....

Date .....

**\* NB 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.**