



**KING EDWARD VI SCHOOL,
SOUTHAMPTON**



Stroud School
King Edward VI Preparatory School

CCTV Policy

Rationale:	The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) System at 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).
Owner:	Assistant Head (Digital Strategy) (KES)
Endorsed by Governing Board:	10 June 2021 (next review June 2024)
Revised:	May 2021
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Circulation and publication:	Public/ Website
Related documents:	School's Privacy Notice Data Protection Policy Policy on taking, storing and using images of children Retention of records policy Data breach policy Safeguarding, pastoral, and health and safety policies IT policies, including its Acceptable Use and e-Safety policies Regulation of Investigatory Powers Act (RIPA) 2000 CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office) www.ico.gov.uk

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The System is administered and managed by the School, who act as the Data Controller. 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 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 and visitors with regard to their personal safety.
- To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers and visitors.
- To monitor and uphold discipline among pupils in line with the Pastoral Care, Behaviour and Discipline policy.
- To monitor the security and integrity of the School site and deliveries and arrivals, including car parking.
- To monitor staff and contractors when carrying out work duties.

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, identifying the School as the Data Controller and giving contact details for further information regarding the system.

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 the System is properly recording and that cameras are functioning correctly, on a regular basis.

The System will be checked and serviced no less than annually.

Supervision of the System

Staff authorised by the School to conduct routine supervision of the System may include Caretakers, day or night security, IT staff and relevant staff on duty.

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.

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Storage of Data

The day-to-day management of images will be the responsibility of the Network 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 90 days, 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 our Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals captured, will be recorded.

Access to Images

Access to stored CCTV images will only be granted in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

Unsupervised access to stored CCTV images will only be permitted to the following authorised persons: Head Caretaker, Assistant Heads of Year, Heads of Year, Heads of Section, SLT Administrator, and members of the Senior Leadership Team, or such persons as may be temporarily acting in these roles (for example covering for absence).

For all other persons within the organisation, access to stored CCTV images will only be given with the specific authorisation of one of the aforementioned persons, or the System Manager, and under their direct supervision.

For persons outside of the organisation, authorisation must come from the Head, the Designated Safeguarding Lead, or the Data Protection Lead, and access must be under their direct supervision, or that of the System Manager.

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

The System Manager, or other authorising person detailed above, 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 it is appropriate to 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

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- To data subjects (or their legal representatives) pursuant to an access request on the basis set out 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 or accessed, 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). This log book is held by the System Manager, so all other authorised parties must inform him/her if they access stored images on the System.

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

Other CCTV systems

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.

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.

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 Lead/Bursar.

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

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CCTV FOOTAGE ACCESS REQUEST [OPTIONAL]

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 90 day 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 12, a person with parental responsibility should sign this form. For children over that age, 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.**