

stephen perse

foundation

## CCTV Policy

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## 1. Introduction

- 1.1. The Stephen Perse Foundation (the **Foundation**) uses CCTV cameras to view and record pupils, parents, staff and visitors on and around our premises. We recognise that the images of individuals recorded by CCTV cameras are personal data which must be processed in accordance with data protection laws.
- 1.2. The purpose of this policy is to:
  - outline why and how we will use CCTV, and how we will process personal data recorded by CCTV cameras;
  - ensure that the legal rights of our pupils, parents, staff and visitors relating to their personal data are recognised and respected; and
  - assist staff in complying with relevant legal obligations when working with personal data.
- 1.3. The CCTV System is administered and managed by the Foundation, which is the Data Controller in respect of personal data collected by our CCTV cameras. The System Manager who is responsible for delegating access and for this policy is the Health Safety and Welfare Manager.
- 1.4. This policy will be subject to review from time to time and should be read with reference to the Foundation Privacy Notices (accessible [here](#)). We will also review the ongoing use of existing CCTV cameras regularly to ensure that their use remains necessary and appropriate, and that the system is continuing to address the needs that justified its introduction.
- 1.5. All fixed cameras are in plain sight on the Foundation premises and the Foundation does not routinely use CCTV for covert monitoring or monitoring of private property outside the Foundation grounds. The location of the CCTV cameras across all Foundation sites are listed in a document found in the Health and Safety Shared Drive or can be requested from the System Manager.

## 2. Objectives of the System

- 2.1. The Foundation's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the Foundation believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.
  - To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety and to act as a deterrent against crime.
  - To protect the Foundation buildings and equipment, and the personal property of pupils, staff, volunteers and visitors from damage, disruption, vandalism and other crime.
  - To prevent and detect crime, and support law enforcement bodies in the prevention, detection and prosecution of crime as well as the identification and apprehension of offenders.
  - To monitor the security and integrity of the Foundation site and deliveries and arrivals, including car parking.

- To uphold discipline among pupils in line with the relevant School Rules and the Behaviour Rewards and Sanctions Policy, which are available to parents and pupils on the Foundation website.
  - To assist in day-to-day management, including ensuring the health and safety of pupils, parents, staff and visitors.
  - To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
  - To assist in civil litigation, including employment tribunal proceedings.
- 2.2. Please note that this list is not exhaustive and other purposes may become relevant from time to time.

### **3. Positioning**

- 3.1. Locations for the CCTV cameras have been selected, both inside and outside our premises, that the Foundation reasonably believes require monitoring to address the stated objectives.
- 3.2. Adequate signage has been placed in prominent positions to inform staff, pupils, parents and visitors that they are entering an area in which CCTV is in use, identifying the Foundation as the Data Controller operating the CCTV system and giving contact details for further information regarding the system.
- 3.3. These locations have been chosen to minimise viewing of spaces not relevant to the legitimate purposes of the Foundation's use of CCTV. As far as practically possible, CCTV cameras will not focus on private property; and no images of public spaces will be captured except to a limited extent at site entrances. In addition, surveillance systems will not be used to record sound and no images will be captured from areas in which individuals would have a heightened expectation of privacy, including medical, changing and washroom facilities.

### **4. Maintenance**

- 4.1. The CCTV System will be operational 24 hours a day, every day of the year.
- 4.2. Designated members of staff, delegated by the System Manager, will check and confirm on the CCTV Monthly Check Form that the System is properly recording and that cameras are functioning correctly. Any faults must be reported by the designated member of staff by emailing [ithelpdesk@stephenperse.com](mailto:ithelpdesk@stephenperse.com) and [nhw@stephenperse.com](mailto:nhw@stephenperse.com). If IT are unable to resolve the issue Schoolwatch will be contacted by emailing [info@lessonbox.co.uk](mailto:info@lessonbox.co.uk). The System Manager should be cc'd into the email. Schoolwatch will arrange any necessary maintenance with the System Manager. The system routinely updates Heads of School when there is a disruption to the service.
- 4.3. The System Manager will routinely check that checks are completed.
- 4.4. The System will be checked and (to the extent necessary) serviced no less than annually by Schoolwatch. This is organised by the System Manager.

## **5. Supervision**

- 5.1. We will ensure that recorded images are only viewed by approved members of staff whose roles require them to have access to such data in pursuance of the above objectives. This may include security, HR and safeguarding / pastoral staff. Staff using the CCTV system will be given appropriate training to ensure that they understand and observe the legal requirements related to the processing of relevant data.
- 5.2. Images will only be viewed in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

## **6. Storage of Data**

- 6.1. The day-to-day management of images will be the responsibility of the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.
- 6.2. In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered by CCTV cameras is stored in a way that maintains its integrity and security.
- 6.3. Images will be stored for 30 days and automatically overwritten unless the Foundation considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required to retain such data (for example, by an appropriate third party such as the police or local authority).
- 6.4. Where personal data collected by the CCTV system is retained, it will be held in accordance with applicable data protection laws, our Information and Records Retention Policy and our Privacy Notices.

## **7. Requests for disclosure**

- 7.1. Individuals have the right to access personal data the Foundation holds about them (otherwise known as a “subject access request”, on which please see the Foundation’s Privacy Policies for further information), including information collected by the CCTV system, if it has been retained.
- 7.2. In order to respond to a subject access request, the Foundation will require specific details including (as a minimum) 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 Foundation must also be satisfied as to the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples of circumstances in which the Foundation may authorise disclosure of CCTV images to third parties:
  - Where required to do so by the Police or any relevant local or statutory authority;
  - To make a report regarding suspected criminal behaviour or a safeguarding incident;

- To enable the Designated Safeguarding Lead or their appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- To assist the Foundation in establishing facts in cases of unacceptable pupil behaviour, in which case, the pupil's parents/guardian will be informed as part of the Foundation's management of a particular incident;
- To individual data subjects (or their legal representatives) pursuant to a subject access request (as outlined above);
- To the Foundation's insurance company where required in order to pursue a claim (for example for damage to insured property); or
- In any other circumstances required under law or regulation.

7.4. Where images are disclosed, a record will be made in the System log book including the grounds upon which the decision was made, details of 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 it is appropriate to share images, a secure method of transfer to the appropriate recipient will be used. The method used will be subject to the size of the images and may include the use of a Google Shared Drive, with access given only to those who need it, or password protected files sent by email/encrypted USB. A member of the Operational and Educational Executive Team should be consulted to approve both the decision to share images and the method of transfer.

7.6. The Foundation reserves the right to obscure images of third parties when disclosing CCTV footage, where we consider it necessary to do so.

## **8. Complaints and queries**

8.1. Any complaints or queries in relation to the Foundation's CCTV system, or its use of CCTV, or requests for copies, should be referred to the System Manager.

## **9. Review and Monitoring**

9.1. The policy and associated procedures are monitored informally through verbal reports from staff and visitors and formally at the Health and Safety Committee meetings and at Governing Body meetings.

## **10. Related policies:**

- Security Policy
- Lone Working Policy
- Supervision Policy
- Visitors and Visiting Speakers Policy

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