

CCTV Policy

Introduction

The Closed Circuit Television (CCTV) System is administered and managed by the Stephen Perse Foundation (the **Foundation**), which acts as the Data Controller. This policy should be read with reference to the Foundation Privacy Notices (accessible [here](#)). For further guidance, please review the Information Commissioner's guidance on use of Video Surveillance (accessible [here](#)).

The system manager who is responsible for delegating access and for this policy is the Vice Principal.

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 Estates and Logistics Bursar.

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.

1. Objectives of the System

- 1.1. To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 1.2. To protect the Foundation buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- 1.3. To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- 1.4. To monitor the security and integrity of the Foundation site and deliveries and arrivals.
- 1.5. To uphold discipline among pupils in line with the relevant School Rules and the Behaviour and Discipline Policy, which are available to parents and pupils on request.
- 1.6. The Maintenance workshop will have internal cameras installed for H&S and security reasons.

2. Positioning

- 2.1. Locations have been selected, both inside and out, that the Foundation reasonably believes require monitoring to address the stated objectives.
- 2.2. Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area, identifying the Foundation as the Data Controller and giving contact details for further information regarding the system.
- 2.3. No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- 2.4. No images of public spaces will be captured except to a limited extent at site entrances.

3. Maintenance

- 3.1. The CCTV System will be operational 24 hours a day, every day of the year.
- 3.2. Heads of School, delegated by the System Manager will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
- 3.3. The System will be checked and (to the extent necessary) serviced no less than annually.

4. Supervision of the System

- 4.1. Routine supervision of the System will be conducted by Heads of School and staff delegated by them for this purpose. The system routine updates Heads of School when there is a disruption to the service.
- 4.2. Images will be viewed in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

5. Storage of Data

- 5.1. 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.
- 5.2. Images will be stored for a month, and automatically overwritten unless the Foundation 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.
- 5.3. Where such data is retained, it will be retained in accordance with applicable data protection laws, our Information and Records Retention Policy and our Privacy Notices.

6. Access to Images

- 6.1. Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, the Principal, the Foundation DSL or Head of School, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

- 6.2. Individuals also have the right to access personal data the Foundation holds on them (please see the Foundation's Privacy Policies), including information held on the System, if it has been kept. The Foundation will require specific details including at least 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. Images from which a person believes they may be identified can be requested by contacting the Principal or Vice Principal to request access to CCTV footage. Please note that the images are automatically overwritten after a month.
- 6.3. 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 of when the System Manager may authorise access to CCTV images:
- 6.3.1. Where required to do so by the Principal, the Police or some relevant statutory authority;
 - 6.3.2. To make a report regarding suspected criminal behaviour;
 - 6.3.3. To enable the Designated Safeguarding Lead or their appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
 - 6.3.4. To assist the Foundation in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian will be informed as part of the Foundation's management of a particular incident;
 - 6.3.5. To data subjects (or their legal representatives) pursuant to a subject access request under the applicable data protection laws and on the basis set out in 6.2 above;
 - 6.3.6. To the Foundation's insurance company where required in order to pursue a claim for damage done to insured property; or
 - 6.3.7. In any other circumstances required under law or regulation.
- 6.4. 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).
- 6.5. 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. A member of the Foundation Leadership Team should be consulted to approve the method of transfer.

7. Complaints and queries

- 7.1. 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 Estates and Logistics Bursar.

8. Review and Monitoring

- 8.1. The policy and associated procedures are monitored informally through verbal reports from staff and visitors and formally at Estates meetings, Health and Safety Committee meetings and at Governing Body meetings.

Related policies:

Contractor and Premises Management Policy

Data Security Policy

Lone Working Policy

Supervision Policy

Visitors and Visiting Speakers Policy

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Version Control

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