

# CLOSED CIRCUIT TELEVISION (CCTV)

## Table of Contents

1	Policy Statement .....	2
2	Positioning.....	3
3	Maintenance .....	3
4	Supervision of the System.....	3
5	Storage of Data .....	3
6	Access to Images.....	4
7	Other CCTV Systems.....	4
8	Complaints and Queries.....	4
9	Review and Development.....	5

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## 1 Policy Statement

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Ewell Castle 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, which acts 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 Data Protection Policies. 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 routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds. The cameras are listed here:

### Senior School

- Castle Reception Door
- Main Entrance - Castle Lobby
- Front Car park
- Inner Castle Gate
- Castle Side Door
- Pledger Building/Sports Hall side view
- Music Pavilion
- Library - Entrance Door
- Library - Computer Room
- Library - Sixth Form Room
- Library - Reading Room
- Budgell Front Left
- Budgell Front Right
- Budgell Rear Left
- Budgell Rear Right
- Room 24 (Computer Suite)
- Room 22
- The Basin
- Budgell ground floor corridor x2
- ICT1 & ICT2

### Prep School

#### *Glyn House*

- Main Entrance Door
- Lower Ground Piano Room
- Lower Ground Drum Room
- 2<sup>nd</sup> Floor Piano Room
- Rear playground view left and right
- Front car park left and right
- Front staff entrance
- Lower ground floor corridor
- Roof

### *Chessington Lodge*

- 2<sup>nd</sup> Floor – Pre-Prep Head Office / Music Practice Room
- Main front door
- Side gate
- Front gate/car park
- Rear playground

The School's purpose for 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.

## **2. Objectives of the System**

- 2.1. To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 2.2. To protect the school buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- 2.3. To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- 2.4. To monitor the security and integrity of the school site and deliveries and arrivals.
- 2.5. To monitor staff and contractors when carrying out work duties.
- 2.6. To monitor and uphold discipline among pupils in line with the School Rules, which are published (Senior School) in the Pupil Handbook and Diary or (Prep School) published in the Parent Handbook and displayed on posters around the buildings in the Prep School.

## **3. Positioning**

- 3.1. Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.
- 3.2. 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.
- 3.3. No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- 3.4. No images of public spaces will be captured except to a limited extent at site entrances.

## **4. Maintenance**

- 3.1. The CCTV System will be operational 24 hours a day, every day of the year.
- 3.2. The Director of ICT Support (defined below) 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. Staff authorised by the School to conduct routine supervision of the System may include Site
- 4.2. Team, Reception Staff and relevant staff on duty.
- 4.3. 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.

## **5. Storage of Data**

- 5.1. The day-to-day management of images will be the responsibility of the ICT Manager who will act as the Director of ICT Support, or such suitable person as the Director of ICT Support shall appoint in his or her absence.
- 5.2. Images will be stored for up to four 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.
- 5.3. Where such data is retained, it will be retained in accordance with the Act and our Data Protection 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.

## **6 Access to Images**

- 6.1 Access to stored CCTV images will only be given to authorised persons, under the supervision of the Director of ICT Support, 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 School holds on them (please see the Data Protection 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.
- 6.3 The Director of ICT Support 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 Director of ICT Support 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 his appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
  - 6.3.4 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;
  - 6.3.5 To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 6.2 above;
  - 6.3.6 To the School'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 images are provided to third parties under 6.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

## **7 Other CCTV Systems**

- 7.1 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 and/or its School Rules.
- 7.2 A CCTV camera is used in the small school minibus when a lone member of staff transports

individual pupils.

## **8 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 Bursar.

## **9 Review and Development**

### **9.1 Procedure**

This document, together with the effectiveness of its procedures, is reviewed annually by the Senior Leadership Team and as events or legislation change requires.

### **9.2 Links with other Policies**

This policy should be read in conjunction with the following documents:

- Data Protection policies
- Privacy Notices