



CCTV Policy

Version number: 1.2

Last updated: October 2024

Summary of changes and reviews

| Version | Date | Summary of amendments | By |
|---------|----------|---|----|
| 1.0 | 3 May 23 | Initial version upon installation of CCTV | SB |
| 1.1 | 7 Oct 24 | Expansion of CCTV into minibuses | SB |
| 1.2 | 3 Feb 25 | Expansion of CCTV in main school to new areas | SB |



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CCTV POLICY

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) system at Hatherop 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 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 Notice and Data Protection Policy. For further guidance, please review the Information Commissioner's CCTV Code of Practice (accessible [here](#)).

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 locations of cameras, both in the main school building, are:

- Locker room.
- Downstairs corridor outside the children's toilets.
- Prep 8 locker corridor
- Loggia
- Archway lockers
- Church door
- School minibuses (incorporating external dashcam and internal cameras).

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 and uphold discipline among pupils in line with the school's behaviour policy.

Positioning

Locations have been selected 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.



Maintenance

The CCTV system in the school will be operational 24 hours a day, every day of the year. The cameras in the minibuses operate when the vehicles are running and motion has been detected.

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.

Storage of Data

The day-to-day management of images will be the responsibility of the School Business Manager, who will act as the System Manager, supported by a nominated Deputy (the Deputy Head). Technical support is provided by the Wishford Schools IT Department.

Images for the in-school CCTV will be stored for 30 days, and automatically deleted 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. For the vehicles, the duration will depend upon the usage; there is a small SIM in each camera, and when it is full it will over-write the earliest recordings.

Where such data is retained, it will be retained in accordance with the Data Protection Act 2018 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.

Access to Images

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.

Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager or Deputy 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 school's Privacy Notice and Data Protection Policy), including information held on the system, if it has been kept. The school 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.

The System Manager or Deputy 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 may 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 the Data Protection Act 2018 and 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 to anybody other than the System Manager, Deputy System Manager or the Head in accordance with the 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).

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 School Business Manager.

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

