



KING'S HOUSE SCHOOL

RICHMOND



CCTV POLICY

Member of staff responsible: Bursar
Date of policy review: June 2024
Date of next review: June 2026
Approved by the Head: June 2024



INTRODUCTION

The purpose of this Policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at King's House School and Sports Ground (the “**School**”). It also serves as a notice and a guide to data subjects (including pupils, parents, staff, contractors, volunteers, visitors to the School and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the “**CCTV System**”).

The CCTV 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 Privacy Notice. 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.

OBJECTIVES OF THE CCTV SYSTEM

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.

- To protect pupils, staff, contractors, 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, contractors, volunteers, visitors and members of the public.
- 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 School site and deliveries and arrivals, including car parking.
- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the School's rules, which are available to parents and pupils on request.
- To assist in day-to-day management, including ensuring the health and safety of pupils, parents, staff, contractors 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.



POSITIONING

Locations for the CCTV cameras have been selected, both inside and outside the School's premises, that the School reasonably believes require monitoring to address the above objectives.

Adequate signage has been placed in prominent positions around the premises to inform pupils, parents, staff, contractors and visitors that they are entering a monitored area, identifying the School as the controller operating the CCTV system and including contact details for further information regarding the CCTV system.

These locations have been chosen to minimise viewing of spaces not relevant to the legitimate purposes of the School's monitoring. 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.

MAINTENANCE

The CCTV System will be operational 24 hours a day, every day of the year.

Authorised personnel will check and confirm that the CCTV System is properly recording and that cameras are functioning correctly, on a regular basis.

The CCTV System will be checked and (to the extent necessary) serviced no less than annually.

SUPERVISION OF THE CCTV SYSTEM

The School will ensure that recorded images are only viewed by approved members of staff whose roles require them to have access to such data. This may include caretakers, security, HR and safeguarding / pastoral staff and in respect of the CCTV System used at the sports ground authorised personnel employed by the catering contractor. 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.

Images will only be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons. Where access to the CCTV System is provided by means of an App installed on a mobile device, the App should ideally be installed on a dedicated work device rather than on a personal device (however where the App is installed on a personal device, this must be password-protected) and subject to the user signing an



acceptable use form. As above, if images are to be viewed and/or monitored via the App on a mobile device this should take place in a private area and should not be shared with any unauthorised persons.

STORAGE OF DATA

In order to ensure that the rights of individuals recorded by the CCTV System are protected, the School will ensure that data gathered by CCTV cameras is stored in a way that maintains its integrity and security. Given the large amount of data generated by the CCTV System, the School may store video footage using a cloud computing system. The School will take all reasonable steps to ensure that any cloud service provider maintains the security of the School's information, in accordance with industry standards. The School may also engage data processors to process data on our behalf. The School will ensure appropriate contractual safeguards are in place to protect the security and integrity of the data.

Images will be stored for a maximum of 30 days (subject to the storage limitations of the system), and permanently deleted or automatically over-written unless the School 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).

Where personal data collected by the CCTV System is retained, it will be held in accordance with data protection law and the School's Data Protection Policy.

REQUESTS FOR DISCLOSURE

Individuals have the right to request access to personal data that the School holds about them (otherwise known as a "subject access request", on which please see the School's Privacy Notice and Data Protection Policy for further information), including information collected by the CCTV System, if it has been retained.

In order to respond to a subject access request, the School 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.

The School must also be satisfied as to the identity of the person wishing to view stored images and the legitimacy of their request.



No images from our CCTV cameras will be disclosed to a third party without express permission being given by the School. The following are examples of circumstances in which the School 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 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 pupil's parents/guardian will be informed as part of the School'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 School'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.

Where images are disclosed, 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).

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

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 Operations Manager.

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



CCTV FOOTAGE ACCESS REQUEST

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 30-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 13, a person with parental responsibility should sign this form. For children 13 or over, 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.**



CCTV ACCEPTABLE USE POLICY FOR USING AN APP TO ACCESS THE SCHOOL'S CCTV SYSTEMS

Whenever I use the App to connect to the School's CCTV systems (including connecting my own device to the network) I will follow these principles:

- ensure that any personal device on which the App is installed is password-protected.
- only use the App to view in response to a genuine security concern or prompt.
- only access the School's CCTV systems via the App using my own username and password. I will not share my username or password with anyone else.
- only view and/or monitor the School's CCTV systems via the App on a mobile device in a private area.
- will not allow unauthorised individuals to access the School's CCTV systems.
- will not install any App to access the School's CCTV systems without permission from the Network Manager.
- will not share the images with any person without the express consent of the Network or Operations Manager.

I understand that it is my responsibility to ensure that I remain up-to-date and read and understand the School's most recent CCTV policies.

I agree to abide by all the points above.

Signature: _____ Date: _____

Full Name: _____ (printed)

Job title: _____