



# Clifton High School

co-educational nursery pre-school to sixth form

<b>Policy applies from EYFS to Sixth Form</b>	<b>CCTV – Including Video Entry</b>
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Date policy to be reviewed	25.01.2021
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A shaded area denotes a regulation to which all schools must comply	

*Clifton High School is committed to child protection and safeguarding children and young people and expects all staff, visitors and volunteers to share this commitment.*

## Related Policies

Data Protection, Retention and Management  
Filtering and Monitoring  
Health and Safety  
Misconduct and Discipline  
Premises  
Privacy Notice  
Security  
Supervision

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) including Video Entry Systems at Clifton High School.

It also serves as a notice and a guide to pupils, parents, staff, visitors, volunteers and members of the public regarding their rights in relation to personal data recorded via the CCTV system (the System).

In accordance with the General Data Protection Regulation (GDPR) 2018, Clifton High School has registered as a Data Controller with the Information Commissioner's Office (ICO), detailing which information is held and how it is used, this applies to all information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically. The Schools ICO number is Z7520007.

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 School's CCTV cameras are located on external walls, in IT suites, common rooms, the swimming pool and library.

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, parents, staff, visitors, volunteers and members of the public regarding their personal safety
- To protect the School buildings, equipment and the personal property of pupils, staff, volunteers, visitors and members of the public
- To monitor the security and integrity of the School site

- 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 Misconduct and Discipline Policy

### **Positioning**

Locations have been selected that the School reasonably believes require monitoring to address the stated objectives. Adequate signage is placed in prominent positions to inform everyone that they are entering a monitored area. No images will be captured from areas in which individuals would have a heightened expectation of privacy.

### **Storage of Data**

The day-to-day management of images will be the responsibility of the IT Manager. Images will be stored for two weeks, and automatically over-written unless the School considers it reasonably necessary for the pursuit of the policy objectives, or if lawfully required by an appropriate third party such as the police or local authority. Where such data is retained, it will be retained in accordance with the Clifton High School Data Protection, Retention and Management Policy.

### **Access to Images**

Access to stored CCTV images will only be given to authorised persons as approved by the Head of School or the Director of Finance and Operations under the supervision of the IT 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 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 Head of School or the Director of Finance and Operations 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 School may authorise access to CCTV images by the Head of School, or if lawfully required by an appropriate third party such as the police or local authority**

- To make a report regarding suspected criminal behaviour
- To enable the Designated Safeguarding Lead 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 will be informed as part of the School's management of an incident
- To pupils (or their legal representatives) following a subject access request
- To the School's insurance company to pursue a claim for damage done to insured property
- In any other circumstances required under law or regulation

### **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 and/or its School Rules.

Any complaints or queries in relation to the School's CCTV or video entry system, or its use of CCTV, or requests for copies, should be referred to The Director of Finance and Operations in the first instance. For any other queries concerning the use of your personal data by the School, please see the School's Privacy Notices.