

	Policy Name: Closed Circuit Television (CCTV) Policy
	Owner: Bursar                      Last Review Date : 16/11/18
	This policy will be revised as regulations or review demands

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Mayfield School (the **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, 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 Data Protection Policy and Privacy Notice. For further guidance, please review the Information Commissioner's CCTV Code of Practice which can be found on their website [www.ico.org.uk](http://www.ico.org.uk).

All fixed cameras are in plain sight on the School premises and the School does not use CCTV for covert monitoring or monitoring of private property outside the School grounds. Cameras are only in operation in the Stable Yard.

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.

## 1. Objectives of the System

- 1.1 To protect the School buildings (the Stable Yard) and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- 1.2 To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 1.3 To protect the health and wellbeing of the horses in the stable yard at Mayfield School together with their security.
- 1.4 To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- 1.5 To monitor the security and integrity of the School stable yard and deliveries and arrivals.

## 2. Positioning

- 2.1 The Location has been selected because the School reasonably believes it requires 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 School 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 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.

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

### **4. Supervision of the System**

4.1 Subject to Paragraph 6.4, Staff authorised by the School to supervise the System will only include Stable Yard Management, IT staff and the Bursar.

4.2 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 Yard Manager who will act as 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 no longer than 2 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 beyond the 2 week period (for example where a theft happens and images are retained to assist the Police), 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. The system log book is held securely in the HR Office and can be accessed by the Yard Manager / Director of Riding when they request images are retained. The School's IT Department will be responsible for retaining the image and storing it securely.

### **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, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

6.2 The System Manager can access images in real time on a secure mobile application on a School Mobile Device. The security of this device is in line with the School's ICT Policy.

6.3 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 and date 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.

6.4 The System Manager must satisfy his or herself 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:

- 6.4.1 Where required to do so by the Head, the Bursar, the Police or some relevant statutory authority;
  - 6.4.2 To make a report regarding suspected criminal behaviour;
  - 6.4.3 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;
  - 6.4.4 To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
  - 6.4.5 In any other circumstances required under law or regulation.
- 6.5 Where images are disclosed under 6.4 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).
- 6.6 Where images are provided to third parties under 6.4 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 these 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 School rules.
- 8. Complaints and queries**
- 8.1 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.
- 8.2 For any other queries concerning the use of your personal data by the School, please see the School's applicable Privacy Notice.