



Closed Circuit Television (CCTV) Policy

This policy is the responsibility of the Director of Operations and Compliance to review and update annually.

Scope

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Malvern St James School (hereafter '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 Privacy Notice. For further guidance, please review the Information Commissioner's CCTV Code of Practice (accessible <https://www.gov.uk/government/publications/surveillance-camera-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 estate. The cameras currently cover all external entrances to the main School building, the main entrance and reception, the side door, porte-cochere door and general overview of the Quad area. Additional cameras provide similar coverages around the boarding houses, The Avenue and the pathway linking the Dome to Imperial Road. An additional system is in place to provide coverage of the Sports Centre both inside and out.

Justification & Objectives

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 the security and integrity of the School site, associated deliveries and arrivals, and 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 Code of Conduct and other policies, which are available to parents and pupils on request.

Positioning

- Locations have been selected, both inside and out, 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 except to a limited extent at site entrances.

Maintenance

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

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.

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

Supervision of the System

Staff authorised by the School to conduct routine supervision of the System may include, but are not limited to, the School and Sports Centre receptionists, supervisors at the sports centre, the Night Security Wardens, IT Network manager, Director of Operations and Compliance and members of the Safeguarding Team and duty SLT members.

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.

Storage of Data

The Director of Operations and Compliance has delegated the day-to-day management of images will be the responsibility of the IT Network Manager who will act as the System Manager, or such suitable person as the System Manager shall appoint in his absence.

Images will be stored for approximately 3 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.

Where such data is retained, it will be retained in accordance with the General Data Protection Regulation (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

Access to stored CCTV images will only be given to authorised persons identified as such by the Headmistress or Director of Operations and Compliance. The imagery will be provided 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).

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 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.

The 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. All requests are to be authorised by the Director of Operations and Compliance. The following are examples when the System Manager may authorise access to CCTV images:

Where required to do so by the Headmistress, Director of Operations and Compliance, the Police or some relevant statutory authority;

To make a report regarding suspected criminal behaviour;

To enable the Designated Safeguarding Lead or 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 will 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 General Data Protection Regulation;

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, a record will be made in the (electronic) 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). Where images are provided to third parties, if practicable, steps will be taken to obscure images of non-relevant

individuals.

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.

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 Director of Operations and Compliance (Dirops@malvernstjames.co.uk)

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

Authorised by	Resolution of the School Council
Signature	
Date	14 October 2020

Effective date of the policy	14 October 2020
Review date	August 2021
Circulation	Members of School Council / teaching staff / all staff / parents / pupils [on request]

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 [x] 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 12/13), a person with parental responsibility must sign this form. For children over 13, 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.**