



Culford School's Close Circuit Television, Dashboard Cameras and Sport Performance Camera's Policy

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) system, dashboard cameras for school owned vehicles and sports performance recording system for Culford School (the **School**). It also serves as a notice and a guide to data subjects (including pupils, parents, employees, volunteers, governors, visitors to the School and members of the public) regarding their rights in relation to personal data recorded via these systems.

CCTV and vehicle dashboard camera systems are administered and managed by the School, who act as the Data Controller. The sports performance recording system is administered by Spiideo who is the Data Processor and Culford School is 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. For further guidance, please review the Information Commissioner's CCTV Code of Practice (accessible here [link](#)).

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. Every passenger vehicle operated by the School has an internal and external facing Dashboard Camera. The sports performance camera systems is fixed to the Walled Garden Hockey Pitch and inside the Sports Hall. Use of a hand held camera for recording sports related activities will be made known to players, parents and visitors at the time of recording. Signage is positioned around the site to make individuals aware of the recording of CCTV on School premises.

The School's purposes for using the CCTV and Dashboard Camera 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.

Objectives of the Systems

- To protect pupils, staff, volunteers, contractors, commercial customers, visitors and members of the public with regard to their personal safety;
- To support the management of safeguarding on school grounds;
- To protect the school buildings, vehicles equipment, and the personal property of pupils, staff, volunteers, contractors, commercial customers, 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 and/or vehicles;
- To provide evidence of damage or loss to the School's insurance company;
- To monitor the security and integrity of the School site including deliveries and arrivals;
- To monitor staff and contractors when carrying out work duties;
- To monitor passenger vehicles operated by the school;
- To monitor areas of the sports pitches during selected events or to determine weather impact on the safety of the pitches;
- To monitor and uphold discipline among pupils in line with the schools handbooks, which are available to parents and pupils on the [School website](#) or 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;
- No images will be captured from areas in which individuals would have a heightened expectation of privacy, including sleeping, changing and washroom facilities;
- No images of public spaces will be captured except to a limited extent at site entrances and exits, sports pitches, around boarding and teaching buildings.

Maintenance

- The CCTV system will be operational 24 hours a day, every day of the year.
- The Dashboard Cameras should be checked by drivers before each journey to ensure it is working and recording.
- The IT Services Department will check and confirm that the system is properly recording and that cameras are functioning correctly and on a regular basis.
- The systems will be checked and (to the extent necessary) serviced regularly.

Supervision of the System

- Employees authorised by the School to conduct routine supervision of CCTV may include Caretakers, IT technicians, supervisors at the sports centre and relevant staff on duty.
- 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 day-to-day management of images will be the responsibility of the Head of IT Services, or such suitable person as the Head of IT Services shall appoint in their absence.
- Images will be stored for [e.g. 2-4 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 Data Protection Act 2018 and the School's 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 retained;

Access to Images

- Access to stored CCTV images will only be given to authorised persons, under the supervision of the Head of IT Services, 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 Data Protection Policy), including information held on the CCTV system, if it has been retained. 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 Head of IT Services 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 Head of IT Services may authorise access to CCTV images:

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- Where required to do so by the Head, the Bursar or their representative, 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 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 the Data Protection Act 2018;
- To the School's insurance company where required in order to pursue a claim for loss or damage to insured property; or
- In any other circumstances required under law or regulation.
- Where images are disclosed as detailed 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).
- Where images are provided to third parties under the above rights, wherever 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 in line with the objectives of the School's own CCTV policy and/or its school rules.
- Many pupils travel 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.
- The tennis dome has cameras recording pupil and coach training sessions and selected matches. The lessons may be broadcast live onto an online streaming service. This allows parents to view their child's training session from anywhere in the world. Access to this service is restricted and regular access updates will occur to support the continued restricted access to the service. The school will ask for consent for pupils and or parents using this facility and signage is in place to make individuals aware of the recording taking place within the premises. These recordings are retained for no longer the 5 hours.
- Sports performance cameras that use the Spiideo recording system will be used during selected matches, training sessions or to provide evidence for PE examinations or assessments. Parents and/ or pupils will be able to object to being recorded. Live streaming of chosen matches would allow parents to view their child's matches from anywhere in the world. Access to this service would be restricted and regular access updates will occur to support the continued restricted access to the service. Culford will seek permission to record matches against external teams and where agreed share links to live steaming of these matches.

Complaints and queries

If you have any further questions about any of the recording systems details in this policy please refer them to The Compliance Officer. Compliance@culford.co.uk

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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 two week 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.**