



CCTV Policy

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CCTV Policy

Introduction

We currently use CCTV cameras to view and record individuals on and around our premises in order to help us maintain a safe and secure environment but we recognise that individuals may have concerns about the effect of such filming on their privacy. This policy is intended to address those concerns and to provide reassurance about the safeguards we have in place.

Images recorded by the CCTV cameras are personal data which must be processed in accordance with data protection laws. We are committed to complying with our legal obligations and ensuring the privacy rights of staff, students and visitors are recognised and respected.

This policy will therefore outline why we use camera surveillance, how we use it and how we process the data we capture to ensure we are compliant with data protection law and best practice.

Scope

This policy applies to all staff, students and visitors at St. Andrews International School, Samakee.

Responsible Personnel

The PDPA Working Team is responsible for the overall operation of this policy and for ensuring compliance with the relevant legislation. Day-to-day management responsibility for deciding what information is recorded, how it will be used and to whom it will be disclosed has been delegated to the PDPA Working Team. Operational responsibility for the cameras and the storage of data is the responsibility of the PDPA Working Team.

The responsibility for ensuring this policy is kept up to date has been delegated to the PDPA Working Team.

Reasons for the use of CCTV

We currently use CCTV around our site for the following purposes: -

- for the security and personal safety of staff, students, visitors and other members of the public and to act as a deterrent against crime;
- to prevent and detect crime and to protect buildings and assets from damage, disruption, vandalism and other crime;
- to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;
- to assist in the defence of any civil litigation, including employment proceedings;
- to support law enforcement bodies in the prevention, detection and prosecution of crime;
- to assist in day-to-day management, ensuring the health and safety of staff, students, visitors and other members of the public;

This list is not exhaustive and other purposes may be or become relevant.

We consider the use of CCTV to be in our legitimate interests to protect property and to maintain the safety of individuals.

Location of Cameras

The location of each camera is carefully chosen so that it will only monitor the area relevant for the intended purpose and to ensure that it is not positioned in an area where there is an expectation of privacy (e.g. changing rooms and toilets).

The current locations of our CCTV cameras are as follows:-

- The exterior of the building, including the main and secondary exits in these locations:
- The interior of the building in these locations:
- Walkways and play areas.

System Operations

Our cameras are not used to record sound but are in operation 24 hours a day, 365 days a year.

We ensure that signs are displayed in a prominent area adjacent to the surveillance zone to alert individuals that their image may be recorded. These signs should contain the following information:-

St. Andrews International School, Samakee operates CCTV in this area.

We are recording images in this area in accordance with our CCTV Policy for the legitimate interests of protecting property and maintaining the safety of individuals.

Please contact the PDPA Working Team for further information.

Images collected by the CCTV are viewed in secure offices by authorised members of staff whose role requires them to have access to the data.

Live feeds are only monitored where this is reasonably necessary, for example to protect health and safety, and when authorised by the PDPA Working Team.

Storage of Data

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the data, where it is possible to do so.

We may store images recorded by the CCTV using a cloud computing system. We take reasonable steps to ensure that any cloud service provider maintains the security of this information.

We may engage data processors to process data on our behalf. We ensure the necessary contractual safeguards are in place to protect the security and integrity of the data.

Data Retention

Images will be automatically deleted after 10 days unless the images are required as evidence or for a purpose stated above which requires a longer retention period, in which case the images will be deleted once that purpose has been fulfilled.

Once the purpose for holding the images has been fulfilled, all images will be erased permanently and securely. Any physical matter, such as still photographs, hard copy prints, tapes or discs, will be disposed of as confidential waste.

Management of CCTV

Prior to the introduction of any new CCTV cameras, we carefully consider where they are placed and what data they will capture by carrying out a Data Protection Impact Assessment (DPIA). This process is intended to assist us in deciding whether the new cameras are necessary and proportionate in the circumstances.

Review of CCTV use

We ensure that the use of our existing CCTV cameras is reviewed periodically, and at least on an annual basis, to ensure that the images are clear and high quality. We also ensure that their use remains necessary and appropriate, and that we are continuing to address the needs that justified the camera's initial introduction.

Requests for disclosure

We may allow appropriate law enforcement agencies to view or remove CCTV footage where this is required for the detecting or prosecution of crime.

We may also release CCTV footage to a third party where it is required for legal proceedings or has been requested by way of a court order.

We maintain a record of all disclosures of CCTV footage.

We do not post images captured on CCTV online or disclose them to the media.

Subject Access Requests (SARs)

Individuals may make a request for the disclosure of their personal data and this may include CCTV images. This is called a subject access request. Information about how to exercise this, and other rights, can be found in the Information Rights Policy.

To enable us to locate relevant footage, any requests for recorded CCTV must include the date and time of the recording, the location of where the footage was captured and, if necessary, information identifying the individual concerned.

We reserve the right to obscure images of third parties when disclosing CCTV images as part of a subject access request, in all cases where we consider it necessary to do so.

Contact us

If you have any questions relating to this policy or wish to lodge a complaint, please contact dpo@standrews-samakee.com