



# PRESTFELDE

## **CCTV POLICY**

Written:

September 2021

Approved by Governors and Health and Safety Committee:

TBC

Review:

September 2022

## **1. Introduction**

Prestfelde School is based in 30 acres of quiet parkland located on the edge of Shrewsbury. The school has three access points. The size of the school site makes it difficult to secure the perimeter so we have therefore looked at alternative ways of providing security for both our pupils and the public and to assist in the prevention of theft or damage to the school or its property. The main legislation in this area is the Data Protection Act 2018, the General Data Protection Regulation (GDPR), the Human Rights Act 1998 as well as the Education (Independent School Standards) Regulations 2014. Other legislation not directly relevant to independent schools, but applicable to general principles, include the Regulation of Investigatory Powers Act 2000 and the Protection of Freedoms Act 2012.

We have notified the Information Commissioner's Office (ICO) that we operate a CCTV system.

## **2. Aims of this policy**

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Prestfelde School. It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors 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 is reviewed regularly and should be read with reference to the School's Data Protection Policy (available on our website). We conduct an annual audit and review of our use of CCTV using the checklist in Appendix 2 of the ICO's CCTV Code of Practice. This was last completed in September 2020.

Records are kept by the Bursar. 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 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.

## **3. Objectives of the System**

- 3.1 To protect the personal safety of pupils, staff, volunteers, visitors and members of the public.
- 3.2 To protect the School buildings and equipment, and personal property of pupils, staff, volunteers, visitors and members of the public.
- 3.3 To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- 3.4 To monitor the security and integrity of the School site and deliveries and arrivals.

## **4. Positioning**

- 4.1 Locations have been selected outside the school that the School reasonably believes require monitoring to address the stated objectives.

4.2 Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area.

4.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.

4.4 No images of public spaces will be captured except to a limited extent at site entrances. We have 3 CCTV camera systems and 9 cameras, all of which are equipped with IR night vision, are vandal, and weatherproof. Our monitors are in the school's Main Office and in Highfields House.

The cameras are listed here:

- The main entrance to Prestfelde House
- The gate from Highfields House
- The exit gate next to the Lodge

## **5. Maintenance**

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

5.2 The System Manager (defined below) will check and confirm that the System is recording and that cameras are functioning correctly, on a regular basis.

5.3 The System will be checked and (to the extent necessary) serviced regularly.

## **6. Supervision of the System**

6.1 The Estates Manager is trained in operating, recording and retaining images taken. He is aware of the procedure for handling requests for the disclosure of an image by individuals, where the school's procedure is set out in our data protection policy. If in doubt, the Information Commissioner would be consulted.

6.2 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.

## **7. Storage of Data**

7.1 The day-to-day management of images will be the responsibility of the Estates Manager, who acts as the System Manager, or such suitable person as the System Manager shall appoint in his absence.

7.2 Images will be stored for 30 days 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.

7.3 Where such data is retained, it will be retained in accordance with the Act and our Data Protection Policy. Information including the date, time and length of any recording if applicable, as well as the locations covered and groups or individuals recorded, will be recorded in a log book. The log book is kept in the School's main office.

## **8. Access to Images**

8.1 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).

8.2 Individuals also have the right to access personal data the School holds on them (please see the Data Protection Policy & Privacy Notice on our website), 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.

8.3 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. The following are examples when the System Manager may authorise access to CCTV images:

- Where required to do so by the Head, the Police or some relevant statutory authority;
- To make a report regarding suspected criminal behaviour;
- To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 8.2 above;
- 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.

8.4 Where images are disclosed under 8.3 above a record will be made in the 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).

8.5 If images are provided to third parties under 8.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

- The following staff have access to the CCTV:
- Estates Manager (System Manager)
- Head Teacher
- Deputy Head (Academic)
- Deputy Head (Pastoral)
- Director of Finance & Operations
- Network Manager & ICT Technician
- Reception and Office staff

## **9. Other CCTV systems**

The School does not own or manage third party CCTV systems, but may be provided with images of incidents where this is in line with the School's own CCTV policy and/or its Code of Conduct.

## **10. 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 Bursar, Prestfelde School, London Road, Shrewsbury, Shropshire, SY2 6NZ, telephone 01743 245400

## **11. Other Policies**

This should be read in conjunction with our Data protection policy and privacy notice.

## **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 30 days.

### **Name and address:**

(Proof of ID will 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.....

Pupil signature (if relevant) .....

Print Name.....

Contact Tel/Email.....

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.

Policy reviewed and updated by DBI September 2021