CCTV POLICY

1. **INTRODUCTION**

    The King's (The Cathedral) school uses closed circuit television (CCTV) images to monitor the school's buildings in order to provide a safe and secure environment for pupils, staff and visitors, to reduce crime and to prevent loss or damage to school property. The CCTV system is owned and operated by the school, the deployment of which is determined by the Headteacher, with support from the Premises Manager.

    This policy aims to set out the school's approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on school property.

2. **STATEMENT OF INTENT**

    The purpose of the CCTV system is to:

    - Make members of the school community feel safe
    - Protect members of the school community from harm to themselves or to their property
    - Deter criminality in the school
    - Protect school assets and buildings
    - Assist police to deter and detect crime
    - Determine the cause of accidents
    - Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings
    - To assist in the defence of any litigation proceedings

    The CCTV system will not be used to:

    - Encroach on an individual's right to privacy
    - Monitor people in spaces where they have a heightened expectation of privacy (including toilets cubicles and changing rooms)
    - Follow particular individuals, unless there is an ongoing emergency incident occurring
    - Pursue any other purposes than the ones stated above

    The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

    The CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The system complies with the requirements of the Data Protection Act 2018 and the UK GDPR.

    Footage or any information gleaned through the CCTV system will never be used for commercial purposes.

    In the unlikely event that the police request that CCTV footage be released to the media, the request will only be complied with when written authority has been provided by the police, and only to assist in the investigation of a specific crime.

    The footage generated by the system should be of good enough quality to be of use to the police or the court in identifying suspects.

3. **RELEVANT LEGISLATION AND GUIDANCE**

    This policy is based on:

    Legislation

- UK General Data Protection Regulation
- Data Protection Act 2018
- Human Rights Act 1998
- European Convention on Human Rights
- The Regulation of Investigatory Powers Act 2000
- The Protection of Freedoms Act 2012
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998
- The Children Act 1989
- The Children Act 2004
- The Equality Act 2010

Guidance

- Surveillance Camera Code of Practice (2021)

4. DEFINITIONS

Surveillance: the act of watching a person or a place
CCTV: closed circuit television; video cameras used for surveillance
Covert surveillance: operation of cameras in a place where people have not been made aware they are under surveillance

5. ROLES AND RESPONSIBILITIES

The Governing Board

The governing board has the ultimate responsibility for ensuring the CCTV system is operated within the parameters of this policy and that the relevant legislation (defined in section 3) is complied with.

The Headteacher will:

- Take responsibility for all day-to-day leadership and management of the CCTV system
- Ensure that the CCTV systems are working properly and that the footage they produce is of high quality so that individuals pictured in the footage can be identified
- Sign off on any expansion or upgrading to the CCTV system, after having taken advice from the DPO and/or the school's Data Protection Link Officer, and having taken into account the result of a data protection impact assessment
- Decide, in consultation with the DPO and/or the school's Data Protection Link Officer whether to comply with disclosure of footage requests from third parties
- Ensure that the guidance set out in this policy is followed by all staff

The School's Data Protection Link Officer will:

- Liaise with the data protection officer (DPO) to ensure that the use of the CCTV system is in accordance with the stated aims and that its use is needed and justified
- Ensure all persons with authorisation to access the CCTV system and footage have received proper training in the use of the system and in data protection
- Train all staff to recognise a subject access request
- Deal with subject access requests in line with the UK GDPR and Data Protection Act 2018
- Conduct data protection impact assessments
- Carry out termly checks to determine whether footage is being stored accurately, and being deleted after the retention period

- Inform subjects of how footage of them will be used by the school, what their rights are, and how the school will endeavour to protect their personal information
- Keep accurate records of all data processing activities and make the records public on request
- Ensure that the CCTV system is not infringing on any individual's reasonable right to privacy in public spaces

The School's DPO will:

- Support the Data Protection Link to deal with subject access requests in line with the UK GDPR and Data Protection Act 2018
- Review the CCTV policy to check that the school is compliant with legislation
- Monitor compliance with UK data protection law
- Advise on and assist the school with carrying out data protection impact assessments
- Act as a point of contact for communications from the Information Commissioner's Office (ICO)
- Ensure data is handled in accordance with data protection legislation
- Ensure footage is obtained in a legal, fair and transparent manner
- Receive and consider requests for third-party access to CCTV footage

The School's Premises Manager will:

- Take care of the day-to-day maintenance and operation of the CCTV system
- Oversee the security of the CCTV system and footage
- Check the system for faults and security flaws termly
- Ensure the data and time stamps are accurate termly

The School's IT Network Manager will:

- Ensure footage is stored securely and destroyed when it falls out of the retention period

6. **OPERATION OF CCTV**

The CCTV system will be operational 24 hours a day, 365 days a year.

The system is registered with the Information Commissioner's Office.

The system will not record audio.

Recordings will have date and time stamps. This will be checked by the system manager termly and when the clocks change.

7. **LOCATION OF THE CAMERAS**

Cameras are located in places that require monitoring in order to achieve the aims of the CCTV system (stated in section 2) and care will be taken to ensure that reasonable privacy expectations are not violated. The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the GDPR and the Data Protection Act 2018.

Cameras are positioned in order to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

CCTV will not generally be used in classrooms, but in areas within the school that have been identified as not being easily monitored.

Members of staff should have access to details of where CCTV cameras are situated (see Appendix A), with the exception of cameras placed for the purpose of covert monitoring.

CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including school gates, where coverage includes outdoor areas.   Signs will contain details of the purpose for using CCTV. In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

8.   COVERT SURVEILLANCE

Covert surveillance will only be used in extreme circumstances, such as where there is suspicion of a criminal offence. If the situation arises where covert surveillance is needed (such as following police advice for the prevention or detection of crime or where there is a risk to public safety), a data protection impact assessment will be completed in order to comply with data protection law.

Additionally, the proper authorisation forms from the Home Office will be completed and retained where necessary.

9.   STORAGE AND RETENTION OF CCTV IMAGES

Footage will be retained for 30 days. At the end of the retention period, the files will be overwritten automatically.

On occasion footage may be retained for longer than 30 days, for example where a law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation.

Recordings will be downloaded and encrypted, so that the data will be secure and its integrity maintained, so that it can be used as evidence if required.

The DPO will carry out termly checks to determine whether footage is being stored accurately, and being deleted after the retention period.

10.   ACCESS TO CCTV IMAGES

The following members of staff have authorisation to access and review CCTV footage:

- The Headteacher
- The Senior Leadership Team
- The DPO
- The Premises Manager and Site Team
- The IT Network Manager and IT Team
- The Pupil Support Officers
- Anyone with express permission of the headteacher

CCTV footage will only be accessed from authorised personnel's work devices, or from the visual display monitors.

All members of staff who have access will undergo training to ensure proper handling of the system and footage.

Any member of staff who misuses the surveillance system may be committing a criminal offence, and will face disciplinary action.

11.   SUBJECT ACCESS REQUESTS (SAR)

According to the UK GDPR and Data Protection Act 2018, individuals have the right to request a copy of any CCTV footage of themselves.

Upon receiving SAR the school will immediately issue a receipt and will then respond within 1 calendar month.

All staff have received training to recognise SARs. When a SAR is received staff should inform the DPO in writing. When making a request, individuals should provide the school with reasonable information such as the date, time and location the footage was taken to aid school staff in locating the footage.

On occasion the school will reserve the right to refuse a SAR, if, for example, the release of the footage to the subject would prejudice an ongoing investigation.

Images that may identify other individuals need to be obscured to prevent unwarranted identification. The school will attempt to conceal their identities by blurring out their faces, or redacting parts of the footage. If this is not possible the school will seek their consent before releasing the footage. If consent is not forthcoming the still images may be released instead.

The school reserves the right to charge a reasonable fee to cover the administrative costs of complying with a SAR that is repetitive, unfounded or excessive.

Footage that is disclosed in a SAR will be disclosed securely to ensure only the intended recipient has access to it.

Records will be kept that show the date of the disclosure, details of who was provided with the information (the name of the person and the organisation they represent), and why they required it.

Individuals wishing to make a SAR can find more information about their rights, the process of making a request, and what to do if they are dissatisfied with the response to the request on the ICO website.

12. ACCESS TO AND DISCLOSURE OF IMAGES TO THIRD PARTIES

CCTV footage will only be shared with a third party to further the aims of the CCTV system set out in section 2 (e.g. assisting the police in investigating a crime).

Footage will only ever be shared with authorised personnel such as law enforcement agencies or other service providers who reasonably need access to the footage (e.g. investigators).

All requests for access should be set out in writing and sent to the Headteacher and the DPO.

The school will comply with any court orders that grant access to the CCTV footage. The school will provide the courts with the footage they need without giving them unrestricted access. The DPO will consider very carefully how much footage to disclose, and seek legal advice if necessary.

The DPO will ensure that any disclosures that are made are done in compliance with the UK GDPR.

All disclosures will be recorded by the DPO.

13. DATA PROTECTION IMPACT ASSESSMENTS (DPIA)

The school follows the principle of privacy by design. Privacy is taken into account during every stage of the deployment of the CCTV system, including its replacement, development and upgrading.

The system is used only for the purpose of fulfilling its aims (stated in section 2).

When the CCTV system is replaced, developed or upgraded a DPIA will be carried out to be sure the aim of the system is still justifiable, necessary and proportionate.

The DPO will provide guidance on how to carry out the DPIA. The DPIA will be carried out by the school's Data Protection Link Officer supported by the Premises Manager and IT Network manager.

Those whose privacy is most likely to be affected, including the school community and neighbouring residents, will be consulted during the DPIA, and any appropriate safeguards will be put in place.

A new DPIA will be done biennially and/or whenever the CCTV system is upgraded, and/or new cameras are installed.

If any security risks are identified in the course of the DPIA, the school will address them as soon as possible.

14. COMPLAINTS

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance, who will consult with the Data Protection Officer, and act in accordance with the school's Complaints Policy and Procedures.

15. MONITORING

The policy will be reviewed every two years by the school's Data Protection Link Officer to consider whether the continued use of surveillance cameras remains necessary, proportionate and effective in meeting its stated purposes.

16. LINKS TO OTHER POLICIES

- Data Protection Policy
- Biometric Data Policy
- Main Privacy Notice
- Safeguarding and Child Protection Policy

Appendix A

CCTV CAMERA LOCATIONS

1. Sixth Form Café (Internal)
2. Sixth Form Common Room (Internal)
3. Sixth Form Common Room (Internal)
4. Sixth Form Common Room (Internal)
5. Room 50 ICT (Internal)
6. Room 50 ICT (Internal)
7. Room 150 ICT (Internal)
8. Room 150 ICT (Internal)
9. Fitness Suite (Internal)
10. Fitness Suite (Internal)
11. Sports Hall Entrance (Sports Hall Building Wall) (External)
12. Goods Inwards Entrance (Sixth Form Building Wall) (External)
13. Reception Entrance (Victorian Building Wall) (External)
14. Sixth Form Quad (Main Hall Building Wall) (External)
15. Sixth Form Café Rear Door (Sixth Form Building Wall) (External)
16. Science Car Park Entrance (Science Building Wall) (External)
17. Tech Car Park (Drama Building Wall) (External)
18. Drama Car Park (Drama Building Wall) (External)
19. Learning Support / Drama Entrance (Technology Building Wall) (External)
20. Humanities Quad (Science Building Wall) (External)
21. Victorian Block Car Park (Library Building Wall) (External)
22. Dining Room / Main Foyer Entrance (Dining Hall Wall) (External)
23. Sixth Form Quad (Victorian Building Wall) (External)
24. Maths Quad (Hall Building Wall) (External)
25. Humanities Bridge (Humanities Building Wall) (External)
26. The Orrery (Humanities Building Wall) (External)
27. Tech Quad (Technology Building Wall) (External)
28. Maths Entrance (Technology Building Wall) (External)
29. Madeley Front Entrance (External)
30. Madeley Side Entrance (External)
31. Madeley Play Area (External)
32. Madeley Car Park (External)Madeley Back Gate (External)
33. Madeley Princes Street Entrance (External)
34. Maths / Hall Passageway (Exams Office Wall) (External)
35. Art Room 61 (Internal)
36. Hard Play Area (Drama Building Wall) (External)
37. Main Corridor outside Boys' Toilets (Internal)
38. Main Corridor outside Girls' Toilets (Internal)
39. Huntly Grove Pedestrian Gate (Humanities Building Wall) (External)
40. Granville Street Pedestrian Gate (Drama Building Wall) (External)
41. Sports Hall Corridor (Internal)
42. Sports Hall Corridor (Internal)
43. Main Corridor (Adjacent to Dining Room Entrance) (Internal)
44. Library Wolfson Room (Internal)
45. ICT Room 183 (Internal)
46. Art Room 53 (Internal)
47. Biology ICT (Internal)
48. Faraday ICT (Internal)
49. Dining Room Left (Internal)
50. Dining Room Right (Internal)
51. Music M1 (Internal)
52. Music Side Entrance Foyer (Internal)

53. Junior Department Entrance (Internal)
54. Main Entrance Foyer (Internal)
55. School Hall (Internal)
56. Humanities Upstairs Corridor (Adjacent to Room 193) (Internal)
57. Humanities Downstairs Corridor (Adjacent to Room 93) (Internal)
58. Park Road Small Gate (Science Building Wall) (External)
59. Science Emergency Exit (Science Building Wall) (External)
60. Table Tennis Play Area (Humanities Building Wall) (External)
61. Technology Block Foyer (Internal)
62. Art Corridor (Internal)
63. DT Room 81 (Internal)
64. Science Upstairs Corridor (Internal)
65. Music M3 (Internal)
66. Music M4 (Internal)
67. Learning Support / Drama Foyer (Internal)
68. Sixth Form Upstairs Corridor - Centre (Internal)
69. Sixth Form Upstairs Corridor - End (Internal)
70. Sixth Form Downstairs Corridor - Centre (Internal)
71. Sixth Form Downstairs Corridor - End (Internal)
72. Finance Foyer (Internal)
73. Front Reception (Internal)
74. English Corridor (Tower Foyer) (Internal)
75. English Upstairs Corridor (Internal)
76. UCAS Corridor (Internal)
77. Main Corridor - Science End (Internal)
78. Library (Internal)
79. Music Storeroom (Internal)
80. Music Stageroom (Internal)
81. Behaviour Support (Internal)
82. Humanities Locker Shelter (Humanities Building Wall) (External)
83. Tech Quad Locker Shelter (Technology Building Wall) (External)
84. Science Entrance Locker Shelter (Science Building Wall) (External)
85. Downstairs Humanities Toilets Entrance/Exit (Internal)
86. Upstairs Humanities Toilets Entrance/Exit (Internal)
87. Henry's (Internal)
88. Maths Block Corridor (Internal)
89. Humanities Shelter (External)
90. Science Main Entrance (External)
91. Technology Block Girls Toilets Entrance/Exit (Internal)
92. Technology Block Boys Toilets Entrance/Exit (Internal)
93. Library English Bridge (Internal)
94. Staff Room Corridor (Internal)
95. Conference Room Stairs (Internal)
96. Sixth Form Boys Toilets Entrance/Exit (Internal)
97. Sixth Form Girls Toilets Entrance/Exit (Internal)
98. Maths Toilets Entrance/Exit (Internal)