



## CCTV Policy

<b>Name of Policy</b>	CCTV Policy
<b>ISSR</b>	N/A
<b>Reviewed by</b>	SLT
<b>Author/SMT</b>	Guy Collins-Down, Chief Operating Officer
<b>Date of school review</b>	July 2024
<b>Date of next school review</b>	August 2025

**This policy applies to both the Junior and Senior Schools.**

### POLICY OVERVIEW

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) System at Alley's 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 is administered and managed by the School, who act as Data Controller. This policy will be subject to review from time to time and should be read in conjunction with the School's Privacy Notice, available [here](#). For further guidance, please review the Information Commissioner's [CCTV Code of Practice](#).

All fixed cameras are in plain sight on the School premises, and are not used for covert monitoring, including that of private property outside the School grounds.

The School's purposes in 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 and deliveries and arrivals.
- 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 for both the Senior & Junior Schools.
- To monitor and support pastoral care requirements throughout the Senior & Junior Schools.

## POSITIONING

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- 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 rooms and bathroom facilities.
- No images of public spaces will be captured, except to a limited extent at site entrances.

## MAINTENANCE

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- The CCTV System is 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

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- Staff authorised by the School to conduct routine supervision of the System may include Concierge, Premises Operatives, senior leaders, and relevant staff on duty.
- Images will be viewed and/or monitored in a suitably secure area to minimise the likelihood of or opportunity for access by unauthorised persons.

## STORAGE OF DATA

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- The day-to-day management of images will be the responsibility of the Director of Strategic Projects who will act as the System Manager, or such suitable person as the System Manager shall appoint in their absence.
- Images will be stored for 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 Data Protection regulation and our Privacy Notice. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be kept via the CCTV Request Form on the School's incident request system 'Every'.

## ACCESS TO IMAGES

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- 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).
- Individuals also have the right to access personal data the School holds about them (please see the [School's Privacy Notice](#)), 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.
- 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 Head of the Junior School, member

- of SLT acting on behalf of the Head, the Police or some relevant statutory authority;
- o To make a report regarding suspected criminal behaviour;
- o To enable the Designated Safeguarding Lead or their appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- o 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;
- o To data subjects (or their legal representatives) pursuant to an access request under Data Protection regulation and on the basis set out above;
- o To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
- o In any other circumstances required under law or regulation.
- Where images are disclosed, a record will be made in the School's incident management request system (Every) 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, wherever feasible, steps will be taken to obscure images of non-relevant individuals.

## OTHER CCTV SYSTEMS

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- 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 and/or its Code of Conduct. For example, many pupils travel to School 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.

## PRIVACY IMPACT ASSESSMENT (PIA)

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### The Need for a PIA

As a school, we have a duty of care to protect our students from any potential harm. We are also an urban school which comes with additional dangers from outside influences. Our CCTV system is there to both deter and to support the school in its security efforts. We want to create secure 'barrier' around the school.

The Privacy Impact Assessment is required as cameras are recording both students and staff in their day-to-day activities.

### Flow of Information

Most cameras are digital with individual IP addressed, hardwired back to the recorder location on each site. Where not they are digital with images stored on the School's CCTV server. Images collected by the cameras are stored digitally on the recorder only which is only accessible by those detailed in this policy.

Where CCTV is required as evidence for a misdemeanour or on the request of the Police, only those with full access are able to download the specific footage. This is only shared if absolutely necessary and is shared in line with our Data Policy.

All individuals within school are affected by the use of CCTV cameras due to their positioning, and where present on site.

### Risk & Consultation

Where cameras have been required in more sensitive areas where individual rights could be affected, the school consult with staff before installation. Any decision to install a camera is scrutinised by the school's senior leadership team.

Access to the system is very restricted to risk of data being lost is low. Where risks may be presented is where footage is needed for a specific use and is downloaded from the system onto the school's main server. Any footage that needs to be downloaded has to be with the express written permission of the system manager.

Files are stored within the secure area of the individual concerned and can only be shared externally (for instance with the Police) with written permission from the system manager.

If footage is used for reasons of student or staff discipline, the evidence must be kept for 12 months. Otherwise, it must be kept in accordance with standard policy (no more than 30 days).

Any breaches are reported to the Data Protection Officer.

### Evaluating Privacy Solutions

This policy is reviewed on an annual basis and is subject to scrutiny by the senior leadership team. They evaluate risks on an annual basis.

At present, there is no requirement to address the risks further. Individuals are made aware that CCTV is in use and may be used if required.

### Any Changes Needed to Current System

The School will be completing a full review of access and CCTV systems over the course of 2024-25 with a review to integration and upgrade of systems to meet modern standards.

### 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 Privacy Officer, via [PrivacyOfficer@alleyns.org.uk](mailto:PrivacyOfficer@alleyns.org.uk).

### CCTV ACCESS REQUEST INFORMATION

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 4 weeks 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 but the more precise the better).
- Admin – approval given by
- Admin – data footage released
- Admin – data storage required
- Admin – data storage location

The above information is submitted via online request form, with data kept within management information system (Every).

### CHANGING NATURE OF SYSTEM

The School is exploring concepts of use of CCTV to aid the School in the following:

- Registration of Pupils (not through facial recognition)
- Pastoral Tracking (Sentiment & Behaviour Tracking)
- Asset tracking
- Determining building usage and flow to aid decision making

The above will be developed alongside our privacy policy, and in line with UK Data Protection provisions. The School will update policies and inform stakeholders as and when changes are made.

### ENDS