

# KING EDWARD'S SCHOOL

## **Title: CCTV Policy**

Status	Approved
Approved by	Bursar
Current Author	TVA
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Application	Whole School
Responsibility	Bursar/ Data Protection Lead

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## Specific Terms

King Edward's School, Bath ("The School")	King Edward's School, Bath including the Senior School, Junior school and Pre-Prep School
King Edward's School is a "data controller."	This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.
Data Protection Officer:	Judicium Consulting Limited Address: 72 Cannon Street, London, EC4N 6AE Email: <a href="mailto:dataservices@judicium.com">dataservices@judicium.com</a> Web: <a href="http://www.judiciumeducation.co.uk">www.judiciumeducation.co.uk</a> Lead Contact: Craig Stilwell
Data Protection Lead	Tracy Vaid Email: <a href="mailto:dataprotection@kesbath.com">dataprotection@kesbath.com</a>
Personal data	Any information relating to an identified or identifiable individual
Special category personal data and Criminal Offence data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, Genetic and biometric data, Data concerning health, sex life or sexual orientation. Criminal offence data includes criminal activity, allegations, investigations and proceedings.

## CCTV POLICY

*This policy contains details specific to King Edward's School, Bath. It will be reviewed every 2 years (or when a new system is introduced) and updated whenever necessary. Existing staff will be notified of any updates via email. Copies of this policy will be available on the school website and the staff VLE.*

### 1. Policy Statement

King Edward's School uses Close Circuit Television ("CCTV") within the premises of the school. The purpose of this policy is to set out the operation, use, storage, and disclosure of CCTV at the School.

The School is committed to the protection of personal data in line with UK GDPR and DPA 2018. This policy applies to all data subjects whose image may be captured by the CCTV system.

### 2. System Management

The CCTV system is owned and operated by King Edward's School and the deployment is determined by the HeadMaster, the Bursar & the Estates & Facilities Manager.

The CCTV system is comprised of 44 cameras across the Senior, Junior, Pre-Prep and Bathampton Sites which record day and night covering the Internal & External areas of the school. Their coverage also extends past the school boundaries to public areas.

The school will:

- Notify the ICO of its use of CCTV as part of its registration.
- Complete a Data Privacy Impact Assessment if amendments are to be made to the deployment or use of CCTV.
- Treat the system and all information processed on the CCTV system as data which is processed under existing data protection legislation.
- Not direct cameras outside of school grounds onto private property, an individual, their property or a specific group of individuals. The exception to this would be if authorisation was obtained for Direct Surveillance as set up by the Regulatory of Investigatory Power Act 2000. Permission will be obtained in this case from the HeadMaster and the Chair of Governors.
- Display Warning signs clearly in prominent places. Specifically, at all external entrances of the school site where CCTV is in use and covers external areas. These signs will include information on how to contact the school regarding information or access to the CCTV footage.
- Ensure that CCTV footage will not be used for any commercial purposes.
- Ensure that cameras will be placed so they only capture images relevant for the purposes for which they are installed, and all care will be taken to ensure that reasonable privacy expectations are not violated.

### 3. Purpose of CCTV

The school uses CCTV for the following purposes:

- To protect pupils, staff and visitors against harm to their person and/or property;
- To increase a sense of personal safety and reduce the fear of crime;
- To protect the school buildings and assets;
- To support the police in preventing and detecting crime;
- To assist in identifying, apprehending and prosecuting offenders;
- To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence; and

- To assist in managing the school.

#### **4. Storage and Retention**

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of people who images have been recorded.

- All Data will be stored securely on a hard drive in the server room where access is restricted.
- Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.
- Data storage on the hard drive is automatically overwritten by the system after a period of between 22-23 days recording time.
- The backup policy for footage is for the data associated with an incident to be securely backed up by the IT Manager.

#### **5. Access to CCTV Images**

The ability to view live CCTV footage or recorded footage is only to be provided by authorised persons once permission has been provided by the Estates & Facilities Manager or the Bursar and includes the IT Manager. At the Pre-Prep, live cctv footage is accessed only by the Headteacher or the Office Manager.

- Specific live monitoring is currently only configured at the Pre-Prep school in the main office to view the live Pre-Prep CCTV Cameras.
- Only in exceptional circumstances would any other individuals be allowed to view footage – see Section 6. Access to 3<sup>rd</sup> parties
- Details of all visits and visitors will be recorded in a system log located in the IT Support sharepoint area this includes time/data of access and details of images viewed and the purpose for so doing.

#### **6. Disclosure of Images to Third Parties**

- Where a person other than those mentioned above, requests access to the CCTV data or system, the System Manager must satisfy him/herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists, access will be refused.
- Third parties acting on behalf of a data subject will be handled in accordance with Section 7.
- CCTV footage will only be disclosed to law enforcement agencies in line with the purpose for which the CCTV system is in place.
- If an order is granted by a court for the disclosure of CCTV images, then this should be complied with. However, consideration must be given to exactly what the court requires.
- In all instances, if there are any concerns as to what should or should not be disclosed then the DPO should be contacted and further legal advice sought.
- A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.

## 7. Requesting access to your personal data

Under data protection legislation, individuals have the right to request access to information that we hold about them. To make a request for your personal information you will need to contact the DPL at [dataprotection@kesbath.com](mailto:dataprotection@kesbath.com) or Extn 210

The DPL is responsible for overseeing this CCTV policy and developing data-related policies and guidelines.

## 8. Complaints

Concerns about the way we are collecting or using personal data should be addressed with us in the first instance using this email address: [dataprotection@kesbath.com](mailto:dataprotection@kesbath.com).

Alternatively, you can make a complaint to the Information Commissioner's Office:

Report a concern online at <https://ico.org.uk/concerns/>

Call 0303 123 1113 or 01625 545 745

Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF