

Including Sandleford, our Early Years Foundation Stage provision

CCTV Policy

Authorised by	resolution of the Board of Governors
Date	Spring 2018 - (Version 1-0-0) Autumn 2018 (1-0-1)
Reviewed	

Our aim is to maintain a safe and secure environment for staff and pupils at all times and as part of this we use CCTV (Closed Circuit Television) on the school site.

The purpose of this policy is to regulate the management and operation of the CCTV System at St Gabriel's (the School). It also serves as a notice and a guide to members of the school community (including pupils, parents, staff, volunteers, visitors to the school and members of the public) regarding their rights around their 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 will be subject to review from time to time, and should be read with reference to the School's Privacy Notice and Data Protection Policy.

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 cameras are listed here:

1. Front of main school and school drive (ANPR enabled);
2. School carpark ;
3. School reception foyer;
4. Red path entrance;
5. Catering office door and Bursary offices door;
6. North block main entrance;
7. North block - north side;
8. Maintenance compound;
9. Swimming pool;
10. Science building;
11. Oval Room and back of main school;
12. Junior School entrance;
13. Sandleford play area;
14. Sandleford fence - east side;
15. Path to Sixth Form Centre;
16. Front of Sixth Form Centre;
17. Back of Sixth Form Centre;
18. Side of Sixth Form Centre;
19. Outbuildings of Sixth Form Centre;
20. Outside of Sixth Form Centre.

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.

Objectives of the System

- 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.

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- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety. Images of staff, volunteers and contractors carrying out work duties may therefore be recorded. Similarly, images of pupils engaged in school activities may also be recorded and may be referred to during any investigation of serious breaches of discipline as detailed in the School's Behaviour Policy and the Exclusion, Removal and Review Policy.
- To monitor the security and integrity of the School site and deliveries and arrivals.

Positioning

- Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the objectives above.
- 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 and washroom facilities.
- No images of public spaces will be captured except to a limited extent at site entrances.

Maintenance

- The CCTV System will be operational 24 hours a day, every day of the year.
- The System Manager (defined below) or the IT Network Manager 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 periodically.

Supervision of the System

- Staff authorised by the School to conduct routine supervision of the System may include the Bursar, IT Network Manager and the site maintenance staff.
- 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.

Storage of Data

- The day-to-day management of images will be the responsibility of the Bursar who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.
- 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.
- Where such data is retained, it will be retained in accordance with the General Data Protection Regulations 2018. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded in a system log book.

Access to Images

- 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 on them (please see the Data Protection Policy and 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 to 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:

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Where required to do so by the Principal, the Police or some relevant statutory authority;

To make a report regarding suspected criminal behaviour;

To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;

To help the school during any investigation carried out in accordance with the Exclusion, Removal and Review policy.

To data subjects (or their legal representatives) following a Subject Access Request (subject to the restrictions 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 by law or regulation.

Where images are disclosed a record will be made in a system 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).

Complaints and queries

Any queries in relation to the School's CCTV system should be referred to the Bursar.

Date	Change History
March 2018	Policy written
Sept 2018	Camera locations and capability updated