



ST PETER'S

PREPARATORY SCHOOL

CCTV Policy

Updated on 28 September 2023
by Mr Dan Morris
(Director of Operations & Compliance)

Approved by Head: *Charlotte P. Jones*

Date: 28 September 2023

Purpose of this Policy

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at St Peter's Preparatory School (the 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).

The system is administered and managed by the school, who acts 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 data protection policy and privacy notice.

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 located

- On the main driveway
- On the main exit gates
- On the eastern side of the Wessex Sports Hall facing towards the Abram Block.
- On the main school car park

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.

1. Objectives of the system

- 1.1 To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 1.2 To protect the school buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- 1.3 To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- 1.4 To monitor the security and integrity of the school site and deliveries and arrivals.
- 1.5 To monitor staff and contractors when carrying out work duties.
- 1.6 To monitor and uphold discipline among pupils in line with the school's Behaviour, discipline & exclusion policy.

2. Positioning

- 2.1 Locations have been selected that the school reasonably believes require monitoring to address the stated objectives.
- 2.2 Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area.

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

2.4 No images of public spaces will be captured except to a limited extent at site entrances.

3. Maintenance

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

3.2 The IT Support Officer will check and confirm that the system is properly recording and that cameras are functioning correctly, on a regular basis.

3.3 The system will be checked regularly.

4. Supervision of the System

4.1 Staff authorised by the school to conduct routine supervision of the system include the senior leadership team, the IT Support Officer, our outsourced IT company (CAPTech), reception, grounds or maintenance team as well as and relevant boarding staff on duty.

4.2 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.

5. Storage of Data

5.1 The day-to-day management of images will be the responsibility of the IT Support Officer.

5.2 Images will be stored for 14 days and automatically overwritten 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.

5.3 Where such data is retained, it will be retained in accordance with the school's 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 recorded.

6. Access to Images

6.1 Access to stored CCTV images will only be given to authorised persons, under the supervision of the Head, Director of Operations & Compliance, or IT Support Officer, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

6.2 Individuals also have the right to access personal data the school holds on them (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.

6.3 The system Manager must satisfy himself 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 IT Network Manager may authorise access to CCTV images:

- 6.3.1 Where required to do so by the Head, the Police or some relevant statutory authority;
 - 6.3.2 To make a report regarding suspected criminal behaviour;
 - 6.3.3 To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
 - 6.3.4 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;
 - 6.3.5 To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 6.2 above;
 - 6.3.6 To the school's insurance company where required in order to pursue a claim for damage done to insured property; or
 - 6.3.7 In any other circumstances required under law or regulation.
 - 6.4 Where images are disclosed under 6.3 above a record will be made in the 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).
 - 6.5 Where images are provided to third parties under 6.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.
- 7. Other CCTV systems**
- 7.1 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 School Rules].
 - 7.2 Occasionally pupils travel on visits to and from 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.
- 8. Complaints and queries**
- 8.1 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 Assistant Head, Compliance in the first instance.

St Peter's Preparatory School 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 a maximum of 99 days.

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)	

Signature*

Print Name.....

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.**

CCTV Checklist

This CCTV equipment and the images recorded by it are controlled by the IT Support Officer who is responsible for how the system is setup and used. The School Owner is responsible for notifying the Information Commissioner about the CCTV system and its purpose.

St Peter's Preparatory School has considered the need for using a CCTV system and has decided it is required for the prevention and detection of crime and for protecting the safety of its pupils, staff and parents. It will not be used for other purposes.

Checked (Date)	By DOM	Date of next policy review: 28.09.2024	
28.09.2023		Date of next notification with ICO 02.10.2024	
The School is aware that notification to the Information Commissioner is necessary and must be renewed annually.			✓
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			✓
Cameras have been sited so that their images are clear enough to allow the police to use them to investigate a crime.			✓
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.			✓
There are signs showing that a CCTV system is in operation visible to people visiting the premises			✓
The recorded images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them			✓
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed).			✓
Recordings will only be made available to law enforcement agencies involved in the prevention and detection of crime, and no other third parties.			✓
The operating equipment is regularly checked to ensure that it is working properly (e.g. the recording media used is of an appropriate standard and that features on the equipment such as the date and time stamp are correctly set).			✓
The School knows how to respond to requests from individuals for access to images relating to that individual. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.			✓