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CCTV Policy

Contents

Reviewed	Autumn 2022
Name of owner/author	DH(P)/ITM
Approval by	Senior Management Team
Target Audience	Whole School Community/Public
Where available	Website, Staffshared Drive
Review Date	Autumn 2024

1   Policy Statement

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Birkdale 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 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 Data Protection Policies. For further guidance, please review the Information Commissioner's CCTV Code of Practice (https://ico.org.uk/media/1542/cctv-code-of-practice.pdf).

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:

Senior School

Oakholme – S3/S4 Locker Rooms (4 cameras), Sport Hall Gym

Exhibition Area – Entrance area below Heeley Hall steps

Heeley Hall – Stage area

Westbury – T11 ICT Room, T12 ICT Room, gate to Endcliffe Crescent

Endcliffe – S5 Locker Room

Grayson – Sixth Form Common Rooms (6 cameras), Locker Room, Sixth Form Study Area (2 cameras), G12 ICT Room, pedestrian gates (3 cameras)

Johnson – Locker Rooms (3 cameras), Table Tennis Room, external bag rack area

Prep School

Clarke House – Entrance camera, Atrium, Cloakroom, Locker corridor

Belmayne House – Entrance camera

Castle Dyke

External (4 Cameras), Entrance foyer

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 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 monitor the security and integrity of the school site including deliveries and arrivals.
- To monitor and uphold discipline among pupils in line with the School Rules, which are published (Senior School) in the Pupil Handbook and Diary or (Prep School) published in the Parent Handbook and displayed on posters around the buildings in the Prep School.

2   Positioning

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 and washroom facilities.

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

3   Maintenance

The CCTV System will be operational up to 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.

4   Supervision of the System

Staff authorised by the School to conduct routine supervision of the System may include Bursar, Heads of Section and their Assistants, Deputy Head, Reception staff and IT 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.

5   Storage of Data

The day-to-day management of images will be the responsibility of the IT Manager 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 up to four 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 the Act and our Data Protection Policy.

6   Access to Images

Access to stored CCTV images is only accessible to the following authorised persons: Head, Head of Prep, Bursar, Deputy Heads, Heads of Section and their Assistants and IT support staff.

Individuals also have the right to access personal data the School holds on them (please see the Data Protection Policy), 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 where others are identifiable in the footage. Any other individual in requested footage will have to give their consent to the release of the images.

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 Police or some relevant statutory authority;
- To make a report regarding suspected criminal behaviour;
- To enable the Designated Safeguarding Lead or his appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- To assist the School in establishing facts in cases of unacceptable pupil behaviour;
- To data subjects (or their legal representatives) pursuant to a subject access request under the Act and on the basis set out 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 under law or regulation.

Where images are disclosed to anyone other than the authorised persons listed above, a record will be kept.

7   Other CCTV Systems

The School does not own or manage third party CCTV systems, but may be provided by third parties with images of incidents where this in line with the objectives of the School's own CCTV policy and/or its School Rules.

8   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 Bursar.

9 Review and Development

9.1 Procedure
This document, together with the effectiveness of its procedures, is reviewed annually by the Senior Management Team and as events or legislation change requires.

9.2 Links with other Policies
This policy should be read in conjunction with the following documents:

- Data Protection Policy
- Safeguarding and Child Protection Policy
- ICO CCTV Code of Practice (https://ico.org.uk/media/1542/cctv-code-of-practice.pdf)