

Closed-Circuit Television (CCTV) System Policy

[This policy applies to the whole school](#)

Purpose

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) System at James Allen's Girls' 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 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. For further guidance, please review the Information Commissioner's CCTV Code of Practice.

Objectives of the System

The School's purposes for 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.

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety and to act as a deterrent against crime
- To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public from damage, disruption, vandalism and other crime
- To support the police and community in preventing and detecting and prosecuting crime, and assist in the identification and apprehension of offenders.
- To monitor the security and integrity of the School site and deliveries and arrivals, including car parking.
- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the School Rules which are available to parents and pupils on request.

Positioning

Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.

2 Dulwich village	PREP	CMC--- all internal fixed position
Front gate –fixed Garden gate –fixed Front door –outside fixed Front door inside -fixed Parents door inside -fixed Playground Wendy House Canopy to playground Bike rack	Front door -fixed Back door-fixed Mezz stairs -fixed Playground outside - fixed Front door outside - fixed	Ground floor left by brown door fire exit Ground floor right side to corridor 1ST floor stairs right side 1ST floor stairs left side 2 x Main hall 2 x CMC reception 2nd floor right side to staircase 2nd floor left side to staircase
JAGS Internal		JAGS External
Front door old reception Goods entrance Drama corridor to court yard Science corridor from Holst hall Physic corridor to maths 39 corridor lower Judge hall Outside theatre door to pond door Corridor outside head door		Front door -fixed Front door old reception -fixed Goods entrance door 6th form court yard -fixed Pupils entrance 5th form – fixed Gate by 152 EDG garden – roaming Rear Holst Hall- roaming Rear Holst Hall ponds -roaming 5th form garden area 6th form front door -roaming Science front Oms entrance Oms car park Oms courtyard Oms rear Oms rear stairwell Snake road Greendale car park Bin area 6th form CMC under croft CMC courtyard CMC rear entrance Rear Theatre fire exit CMC main entrance Prep play area Green play area Old reception gate

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) 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

We will ensure that recorded images are only viewed by approved members of staff whose roles require them to have access to such data. This may include security, HR and safeguarding / pastoral staff. Staff using the CCTV system will be given appropriate training to ensure that they understand and observe the legal requirements related to the processing of relevant data. 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 Head of Security 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 31 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 Act and our Data Protection Policy. 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 the 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 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:

- 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/her 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, in which case, the parents/guardian will be informed as part of the School's management of a particular incident;
- 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;
- 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 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).

Where images are provided to third parties under 6.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

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 is in line with the objectives of the School's own CCTV policy and/or its School Rules.

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.

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 Director of Operations.

For any other queries concerning the use of your personal data by the School, please see the School's applicable Privacy Notice.