

# 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**

Front gate –fixed  
Garden gate –fixed  
Front door –outside fixed  
Parents door inside -fixed  
Playground Wendy House  
Canopy to playground

## **PREP**

Front door -fixed  
Mezz stairs -fixed  
Playground outside -  
fixed  
Front door outside -  
fixed

## **CMC--- all internal fixed position**

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

## **JAGS Internal**

Goods entrance  
Drama corridor to court yard  
Science corridor from Holst  
hall

## **JAGS External**

Front door old reception -fixed  
6th form court yard -fixed  
Pupils entrance 5th form – fixed  
Rear Holst Hall- roaming  
6th form front door -roaming  
Science front  
Oms car park  
Oms rear  
Oms rear stairwell  
Greendale car park  
Bin area 6th form  
CMC undercroft  
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 with refresher training provided at appropriate intervals 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, reporting to the Director of Operations who retains overall accountability for compliance and data protection obligations. In the absence of the System Manager the Director of Operations will appoint a suitable person as the System Manager in their absence.

Images will normally be stored for 31 days and automatically over-written unless required for a specific investigation, safeguarding concern, insurance purpose, or legal requirement. In such cases, the School will define and record a clear retention period in the system log.

Where such data is retained, it will be retained in line with the UK GDPR, the Data Protection Act 2018 and the Information Commissioner's current guidance 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. Individuals may also request erasure, restriction or objection to processing in line with their UK GDPR rights, although such requests may not always be possible to accommodate where retention is necessary for the School's legitimate interests or legal obligations.

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 the section 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 the section above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

Members of the public do not have a right of direct access to CCTV footage. However, where an individual believes that images held by the School may have captured evidence of a crime, they may submit details of the incident (including date, time and location) to the School. In such cases, the School will only release footage directly to the Police or other lawful authority, who may then disclose relevant material to the individual if appropriate.

### **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. Unresolved complaints may also be escalated to the Information Commissioner's Office (ICO).

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