

## **CCTV Policy**

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Colfe's School (the **School**) including Colfe's Leisure Services (**CLS**). 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 and of CLS) 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 Policy (accessible on the School website). For further guidance, please review the [Information Commissioner's CCTV Code of Practice](#).

All fixed cameras are in plain sight on the School premises and the School and CLS do not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds. The cameras locations are listed at appendix I.

The School's and CLS's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the School and CLS believes these purposes are all in their 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 and CLS 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 and CLS.
- 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 rules, which are available to parents and pupils on request.

### **2. Positioning**

- 2.1 Locations have been selected, both inside and out, that the School and CLS reasonably believes require monitoring to address the stated objectives.
- 2.2 Adequate signage has been placed in prominent positions to inform staff, pupil, volunteers, visitors and members of the public and CLS that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.
- 2.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and 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 System Manager (defined below) 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 and (to the extent necessary) serviced no less than annually.

#### **4. Supervision of the System**

4.1 Staff authorised by the School to conduct routine supervision of the System may include premises staff, office staff, supervisors at the sports centre and relevant 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 Operations Director who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.

5.2 Images will be stored for one month 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.

5.3 Where such data is retained, it will be retained in accordance with the Act and our Data Protection Policies. 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.

#### **6. Access to Images**

6.1 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).

6.2 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 the time (to within 30 minutes), 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 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:

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

7.2 Many pupils travel to School and on school trips 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.

7.3 The School operatives Automatic Number Plate Recognition (ANPR) to compile a record of vehicles on site.

## **8. Complaints and queries**

8.1 Any complaints or queries in relation to the School's and CLS's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Bursar.

**Date reviewed February 2022**

## CCTV FOOTAGE ACCESS REQUEST

The following information is required before the School or CLS 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 automatically deletes CCTV recordings after one month.

|   |  |
|---|--|
| Name and address<br>(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.**

## Appendix I

| Building          | Internal/External | Location                                   | Looking at  | System Name                     |
|-------------------|-------------------|--|---|---------------------------------|
| 34 Horn Park Lane | External          | 34 Horn Park Lane north wall               | Senior school main entrance gate                          | Main Entrance Horn park         |
| Performing Arts   | External          | Rear of PAC                                | Top car-park & Site Support                               | Senior Car Park                 |
| Admin block       | External          | Above main reception entrance              | Main Reception entrance                                   | Main Ent Recp                   |
| Admin block       | External          | Outside Bursar's office                    | Security gates to minibus car-park                        | Bursary Gates                   |
| Admin block       | External          | Outside Servery                            | Security gates to top car-park                            | Canteen Entrance                |
| Admin block       | Internal          | Inside Reception                           | Entrance doors and reception                              | Reception                       |
| Main block        | Internal          | ICT suite room 212                         | ICT suite room 212  | Room 212                        |
| Main block        | Internal          | ICT suite room 213                         | ICT suite room 213  | Room 213                        |
| Main block        | Internal          | ICT suite room 310                         | ICT suite room 310  | Room 310                        |
|                   |                   |  |   |                                 |
| Junior School     | External          | Reception playground                       | Main pedestrian security gate to pathway to senior school | Junior Ped Gate                 |
| Junior School     | External          | Pedestrian & vehicle gate at junior school | Inner security pedestrian & vehicle gates on road to CLS  | Junior Vehicle Gate             |
| Junior School     | External          | Above KSI entrance                         | Entrance to KSI & KS2                                     | Junior Reception Playground     |
| Junior School     | External          | 23 Upwood Rd garden wall                   | Upwood Road entrance from UR gates along driveway         | Junior Lower Gate               |
| Junior School     | External          | Reception classes playground               | Csr-park  | Junior Car-park                 |
| Junior School     | External          | By security gate to Reception playground   | Security gate to Reception playground                     | Junior Playground gate          |
|                   |                   |  |   |                                 |
| Sports Centre     | External          | Rear (south side) of Sports Centre         | Rear of pool & boiler house entrance                      | Back CLS Boiler House           |
| Sports Centre     | External          | West side of Pavilion                      | Changing Room Final Exit doors & car park                 | CLS School Changing Entrance    |
| Sports Centre     | External          | West side of Pavilion                      | Car park  | CLS Main Car Park               |
| Sports Centre     | External          | North-east corner of Sports Centre         | Path along front of Sports Centre                         | CLS Field-side Entrance         |
| Sports Centre     | External          | North-west corner of Sports Centre         | Dead-end between pool and pavilion                        | CLS Pavilion Fire Exit/Entrance |
| Sports Centre     | External          | North-east corner of Sports Centre         | East side of centre, tennis courts                        | CLS Tennis Courts               |
| Sports Centre     | Internal          | Reception                                  | Entrance doors and reception                              | CLS Entrance                    |
| Sports Centre     | Internal          | Main gym (studio 1)                        | Main gym (studio 1)                                       | CLS Ground Floor Weights        |
| Sports Centre     | Internal          | Running machines (studio 2)                | Running machines (studio 2)                               | CLS Up Stairs Cardio            |
| Sports Centre     | Internal          | Mats area (studio 2)                       | Mats area (studio 2)                                      | CLS Upper Free Weights          |

## Appendix I

| Building           | Internal/External | Location              | Looking at   | System Name |
|--------------------|-------------------|-----------------------|--|-------------|
| Leathersellers' SG | External          | Schoolhouse SW cornr  | Looking SE down rear of pavilion                   | CAM 1       |
| Leathersellers' SG | External          | Pavilion SE corner    | Looking NW along rear of pavilion and house to A20 | CAM 2       |
| Leathersellers' SG | External          | Pavilion NE corner    | Looking SE along short wall facing raised area     | CAM 3       |
| Leathersellers' SG | External          | Schoolhouse NW corner | Car-park   | CAM 4       |
| Leathersellers' SG | External          | Pavilion NW corner    | Front of pavilion, SE towards Quaggy               | CAM 5       |
| Leathersellers' SG | External          | Pavilion SE corner    | Front pof pavilion, NW towards car-park            | CAM 6       |