

CCTV Policy (Trust including EYFS)

Related Policies

- Privacy Notices
- Retention Policy
- Child Protection Policy (Trust including EYFS)
- Taking, Storing and Using Images Policy (Trust including EYFS)

1. Introduction

- I. The purpose of this policy is to regulate the management, operation and use of the Closed Circuit Television (CCTV) system at St Bede's School Trust Sussex (hereafter "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).
- II. The System is administered and managed by the School, who act as the Data Controller. This policy will be subject to annual review, and should be read with reference to the School's Privacy Notices which can be found [here](#). For further guidance, please review the [Information Commissioner's CCTV Code of Practice](#).

2. Aims

- I. All fixed cameras are in plain sight on the School premises and the School does not routinely use CCTV for covert monitoring or the monitoring of private property outside of the School grounds. The Trust operates two sites, the Senior School in Upper Dicker and Prep School in Eastbourne.
- II. The School uses closed circuit television (CCTV) to prevent crime and to monitor the School buildings and grounds in order to provide a safe and secure environment for Pupils, Staff and Visitors, and to prevent the loss or damage to school property.
- III. The School runs two CCTV systems; an in-house system (Unifi) which is maintained by the School's IT Department and an external system (AXIS) which is serviced and maintained by an external company called Vistec. CCTV cameras are also mounted in some of the School's vehicles.
- IV. The systems comprise of a number of fixed, PTZ and dome cameras located around the School sites, some of the CCTV cameras have the capability to record/play sounds. All CCTV cameras record and all cameras are monitored centrally from the Porters' Lodge which is located at the Senior School in Upper Dicker. Designated staff can also monitor the system remotely and a CCTV monitor is also displayed near to the Senior School Sports centre reception Desk.
- V. CCTV signage is displayed at various points around both campuses. The vehicle CCTV systems comprise of a number of fixed cameras located inside the vehicles, some of the cameras have the capability to record/play sounds.
- VI. All cameras record and are monitored centrally from the Transport Departments which are located at the Senior School in Upper Dicker and the Prep School in Eastbourne. Signage is displayed at various points on the vehicle to make individuals aware of the use of CCTV.
- VII. The introduction of, or changes to, CCTV monitoring, will be subject to consultation and agreement from the School's Security Committee Members.

3. Locations of the CCTV Cameras

3.1 Senior School:

- a) Sports Centre
- b) 10 x Internal and 2 x External
- c) Car Park Entrance
- d) Stables
- e) Chaplaincy
- f) Front Entrance – Main School
- g) School Shop
- h) Cricket Pavilion
- i) Main Drive Bollard
- j) Knights/Charleston Gates
- k) School Shop x 3
- l) Animal Management x 3

3.2 Prep School:

- a) Student Entrance
- b) Rear Astro/Playing Field
- c) Scoreboard/Dining and Transport Area
- d) Headmasters Entrance
- e) Holywell Main Entrance
- f) Downs House Main Entrance
- g) Sports Hall x 2 internal
- h) Side Entrance Gate
- i) Toilet Corridor
- j) Changing room Corridor
- k) Overlooking the front door at Mead's End
- l) Theatre Front Elevation
- m) Pupils' Entrance
- n) Holywell Rear Elevation
- o) Car Park
- p) Rear of the Astro
- q) Sports Hall Rear

3.3 Vehicle Camera:

- a) Senior School Vehicles
- b) Preparatory vehicles

4. Objectives of the CCTV System

- I. 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.

4.1 Objectives:

- a) To protect pupils and safeguard the welfare of pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- b) To protect the School buildings and assets, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- c) To assist in managing the School by monitoring and upholding discipline among pupils in line with the [School Behaviour Policy](#).

- d) To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- e) To monitor security and integrity of the School site and deliveries and arrivals.
- f) To monitor staff and contractors when carrying out work duties.

4.2 Positioning:

- a) Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.
- b) 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.
- c) No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- d) No images of public spaces will be captured except to a limited extent at site entrances.

5. Statement of Intent

- I. The CCTV system will seek to comply with the requirements both of the Data Protection Act (2018), GDPR, and the Commissioner's Code of Practice. The School will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Data Protection Act (2018) and GDPR.
- II. Cameras will be used to monitor activities within the School and its grounds to identify criminal activity actually occurring, anticipated, or perceived. It will be used for the purpose of securing the safety and wellbeing of pupils, staff and visitors.
- III. The system has been designed to deny observation on adjacent private homes, gardens and other areas of private property.
- IV. The vehicle cameras have been designed to capture vehicle incidents and to give a greater understanding of incidents and to help manage driver behaviour.
- V. Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.
- VI. Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police.
- VII. Images will never be released to the media for purposes of entertainment.
- VIII. The planning and design has endeavoured to ensure that the system will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.
- IX. Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible on all main entrances and other areas of the campuses.

6. System Management

- I. The system will be administered and managed by the School who will act as the Data Controller, in accordance with the principles and objectives expressed in the policy.
- II. The day-to-day management will be the responsibility of the Porters' Lodge, Security coordinator (The System Manager) Facilities manager, Transport Manager and Director of Estates, the system management and allocation of CCTV cameras to be governed via the School's Security committee.
- III. The System Manager (Facilities Manager) will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis. In addition, the system will be checked and (to the extent necessary) serviced no less than annually.

- IV. The system and the data collected will only be available to the Data Controller and certain staff members authorised by the School.
- V. The CCTV system will be operated 24 hours each day, every day of the year.
- VI. The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.
- VII. Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals.
- VIII. The following table explains who has access to the CCTV system:

Administrator rights – Full access to system and configuration	Operator – Access to live and recorded video. No access to configuration	Sports Centre Operators – Access to live and recorded video. No access to configuration
<ul style="list-style-type: none"> • UniFi System – Bede’s IT Department • AXIS System – Vistec • Transport Manager (Vehicle CCTV Cameras only) 	<ul style="list-style-type: none"> • Porters’ Lodge Gatekeeping Team via the Porters’ Lodge monitor • Trust Security Coordinator (System Manager) via the Porters’ Lodge monitor • Senior School Principal Deputy Headmaster via Remote Access • Preparatory School Deputy Headmaster via Remote Access • Facilities Manager via Remote Access/Porters’ Lodge monitor • Prep School Maintenance Manager via Remote Access • Transport Manager 	<ul style="list-style-type: none"> • Sports centre Reception Staff have access to the AXIS CCTV system, a CCTV monitor is positioned near to the Sports Centre Reception desk. • Sports Centre Reception Staff must obtain permission from the Director of Sport before viewing any saved images or recordings. • There is a CCTV camera in the Swimming Pool (Senior School) – permission must be obtained from the Director of Sport and the Principal Deputy Headmaster at the Senior School before viewing any saved images or recordings from the swimming pool CCTV camera.

7. Viewing, Storage and Retention of the CCTV Images

- I. Both CCTV systems are displayed on a screen in the Porters’ Lodge. The AXIS system is also displayed on a monitor at the Sports Centre reception desk at the Senior School. There is currently no display screen at the Prep School. The system is running and recording, 24 hours a day, every day of the year.
- II. Images captured via CCTV are classed as ‘sensitive’. Recorded data must be kept for no longer than necessary, the current retention time is 30 days for both the UniFi and AXIS systems and will be 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.
- III. Where such data is retained, it will be retained in accordance with the Data Protection Act 2018, GDPR and our Privacy Notices. 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.

- IV. The retention time is approximate and is based on disk space, depending on the amount of movements recorded. It is important that individuals raise any issues/concerns as soon as is practicably possible to ensure that any supporting CCTV images can be accessed to investigate events. If CCTV images are deemed important to an investigation, these can be copied and removed from automatic deletion and kept to support the investigation, which may exceed the retention period. Any saved clips or images will be destroyed once an investigation is completed.
- V. CCTV must never be copied for any purpose other than a formal investigation initiated by either the Principal Deputy Headmaster at the Senior School, the Deputy Headmaster at the Prep School, the Principal of Summer School or the Trust's Bursar.
- VI. The local Police Authority is also able to request access to these recordings in support of any formal investigations, where their involvement has been initiated by the School or a member of the public.
- VII. All retained data will be stored securely.

8. Access to CCTV images

- I. Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.
- II. Request to access/view CCTV images must be directed to either: The Principal Deputy Headmaster at the Senior School, the Deputy Headmaster at the Prep School, the Trust Bursar, the Trust Facilities Manager, the Director of Estates, the Director of Sport, the Principal of Summer School, the Transport Manager or the Trust Security Coordinator (The System Manager). Final authorisation will also be obtained from either The Principal Deputy Headmaster at the Senior School, the Deputy Headmaster at the Prep School or the Principal of Summer School should the access request involve viewing pictures/videos of any pupils, before any CCTV recordings can be viewed or copied.
- III. The Data Controller, both Deputy Headmasters, the Principal of Summer School the Trust Bursar, the Trust Facilities Manager, the Director of Estates, the Director of Sport, the Transport Manager and the Trust Security Coordinator (the System Manager) must satisfy themselves of the identity of any person wishing to view images or access the system and the legitimacy of the request. Where any doubt exists access will be refused.
- IV. The System Manager and Data Compliance Manager must be made aware of any data subject access requests. The System manager and Data Compliance Manager will keep a record of all data subject access requests and any subsequent release of digital footage to authorised applicants.
- V. Requests by the Police can only be actioned under section 29 of the Data Protection Act 2018. Evidence will be released on the clear understanding that the digital footage remains the property of the School, and both the footage and information contained on it are to be treated in accordance with this Code. The School also retains the right to refuse permission for the Police to pass to any other person the footage or any part of the information contained thereon.
- VI. The data may be used within the School's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.
- VII. Applications received from outside bodies (e.g. solicitors) to view or obtain digital footage will be referred to the Principal Deputy Headmaster at the Senior School or the Trust Bursar. In these circumstances footage will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a data subject access request, or in response to a Court Order. The School also retains the right to refuse permission if the passing on of the digital footage would breach the School's Child Protection Policy, thus placing a child at risk.

8.1 Logistics of access

- I. Staff authorised by the School to conduct routine supervision of the System may include Porters, day or night security, supervisors at the sports centre and relevant staff on duty.
- II. Except where live images are used, by staff on duty at the MPH reception desk, to monitor the Health and Safety of pupils in the Sports complex 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.
- III. 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).
- IV. Individuals also have the right to access personal data the School holds on them (please see the [School's Privacy Notices](#)) 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.

8.2 Legitimate reasons for access

- I. 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:
 - a) Where required to do so by the Head, the Police or some relevant statutory authority;
 - b) To make a report regarding suspected criminal behaviour;
 - c) To enable the Designated Safeguarding Lead or their appointed Deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
 - d) 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;
 - e) To data subjects (or their legal representatives) pursuant to a data subject access request under the Act and on the basis set out in 8. VII above;
 - f) To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
 - g) In any other circumstances required under law or regulation.
- II. Where images are disclosed under 8.2 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).
- III. Where images are provided to third parties under 8. V above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

9. Data Subject Access Requests (DSAR)

- I. CCTV images of identifiable individuals will constitute their "personal data" under the Data Protection Act 2018 and GDPR. The person who installed the camera and determines how the footage is used will be the data controller of this video information (The Trust).
- II. Data Protection law gives individuals the right to request access to their personal data e.g. CCTV footage relating specifically to them.

- III. A request to access CCTV footage can be made via a range of avenues for example, via telephone, in writing or by email. All requests should be forwarded to the Data Compliance Manager as a matter of urgency and any individual submitting a request will be asked to provide sufficient information to enable the footage relating to them to be identified, for example date, time and location.
- IV. The School will respond to all requests within 30 calendar days of receiving a request.
- V. The School reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals, would jeopardise an on-going investigation or would breach the School's Child Protection Policy, thus placing a child at risk.
- VI. To aid with the management of CCTV data subject access requests a CCTV Footage Request form is attached (Appendix A) and the School can request individuals to complete this but it is not mandatory.
- VII. Occasionally, CCTV may capture images which contain sensitive personal data, for example a criminal act. While the School will often have recorded this inadvertently it must be cautious in how it uses, stores or shares such information. There may be safeguarding issues in the case of certain images of relating to children, which may require specific professional advice from the Designated Safeguarding Lead, police, local authority or the Trust's legal advisers.
- VIII. The School may be required to provide CCTV footage as evidence to authorities, most likely the police. This should be treated in the same way as other requests from authorities to share information, and with the same safeguards to ensure it is shared safely and with the right person for specific purposes only to ensure data protection compliance.
- IX. The ICO recognises that, more than is usually so with data subject access requests, a data controller of CCTV cameras is entitled before complying with the request to ask reasonable questions of the data subject to help identify where to look to locate the specific footage identifying the individual. This may include time, date, location, and identifying details of how to isolate the incident or individual.
- X. Care should be taken in disclosure when the footage contains more than one individual. It may be more appropriate to let an individual view footage under supervision on Trust premises, rather than provide a copy (although strictly that is the right under data protection law); or alternatively it may be easier to obscure faces by providing still images that convey the information requested.

10. Other CCTV systems

- I. The School does not own or manage any 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.
- II. 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.

11. Complaints

- I. Complaints about the operation of CCTV within the School should be directed to the Director of Estates in the first instance.
- II. For any other queries concerning the use of personal data by the School, please see the School's Privacy Notices which are available on the School's website.

Owned by:	Security Co-ordinator
Authorised by:	Security Committee
Date:	February 2019
Review Date:	February 2020
Circulation:	All staff, parents, website

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 [x] period.

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 12 / 13 / of Prep School age, according to school policy], a person with parental responsibility should sign this form. For children [over that age / at secondary school], 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.**