



Pitsford School

School Policy Document

Name of Policy: CCTV Policy

Audience: Public

Date for Next Review: Autumn 2023

SLT Member(s) Responsible for Reviewing and Updating the Policy:
S Sherlock/ Health and Safety Committee

INTRODUCTION

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Pitsford School. It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to Pitsford 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 Pitsford School, who act as Data Controller. This policy will be subject to review from time to time, and should be read with reference to Pitsford School's Data Protection Policy/Privacy Notice.

All fixed cameras are in plain sight on Pitsford School premises and Pitsford School does not routinely use CCTV for covert monitoring of private property outside Pitsford School grounds.

Pitsford Schools purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, Pitsford 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

The objective of the CCTV system:

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- To protect Pitsford School buildings and equipment, and the personal property of pupils, staff and volunteers, visitors and members of the public.
- To support the Police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- To monitor the security and integrity of Pitsford School site and delivers and arrivals.



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POSITIONING OF EQUIPMENT

Locations have been selected, both inside and out, that Pitsford 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.

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 Bursar/Network Manager 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

Staff authorised to conduct routine supervision of the System may include the Bursar, Network Manager, Installer, Site Supervisors and relevant staff on duty.

Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or access to unauthorised persons.

STORAGE OF DATA

The day-to-day management of images will be the responsibility of the Network 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 a term, and automatically over-written unless Pitsford 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, will be recorded.



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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 Pitsford School holds on them (please refer to Pitsford School's Privacy Notice and Data Protection Policy), including information held on the System, if it has been kept. Pitsford School will require specific details including at least time, date and camera location before it can 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 identify 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 Headmaster, 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 Pitsford School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardians will be informed as part of Pitsford School's, management of a particular incident
- To Pitsford School's insurance company where required in order to pursue a claim for damage done to insured property
- In any other circumstances required under law or regulation.

Where images are disclosed, a record will be made including the person viewing the images, the time of access, the reason for viewing the images, the details of images and a crime incident number (if applicable).

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

OTHER CCTV SYSTEMS

Pitsford 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 Pitsford 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 may be equipped with CCTV systems. Pitsford 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 Pitsford School's management of a particular incident.



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COMPLAINTS AND QUERIES

Any complaints or queries to Pitsford School's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Headmaster.

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