

# Durston House CCTV Policy

## **Aims of the Policy**

- to explain the management and operation of the Closed Circuit Television (CCTV) System and its associated technology in the monitoring of the premises at Durston House School (**the School**).
- to serve 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**).

## **Objectives of the Policy**

- to document that the CCTV systems are installed externally for the purpose of enhancing the security of the buildings and associated equipment as well as creating mindfulness among the occupants, at any one time, that a surveillance security system is in operation to deter crime, vandalism and theft.
- to explain how the System:
  - protects pupils, staff, volunteers, visitors and members of the public with regard to their personal safety
  - protects the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public
  - supports the police and community in preventing and detecting crime, and assists in the identification and apprehension of offenders
  - monitors the security and integrity of the School sites
- to complement the School's Privacy Notice

## **Introduction**

The System is administered and managed by the School, which act as the Data Controller. This policy should be read with reference to the School's Privacy Notice.

The aim of the CCTV monitoring of Durston House School premises is to deter crime and vandalism and to assist in the protection and safety of the said property and its associated equipment and infrastructure.

For the purposes of security and access to the School during the school day, live images from the System are relayed to discreetly placed monitors in the three School offices.

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

The School's purposes in 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 is not be used for any commercial purpose.

## **The System**

### **Positioning**

- The School reasonably believes that cameras, installed on the front and rear external elevations of the Pre-Prep, the Junior School and the Main School buildings address the stated objectives.
- Adequate signage regarding the presence of the CCTV cameras has been placed in prominent positions.
- No images of public spaces are captured except to a limited extent at site entrances.

### **Supervision of the System**

- The Head of Communications is the System Manager.
- The System Manager is authorised by the School to conduct routine supervision of the System.
- Images are viewed and/or monitored in a suitably secure and private area to minimise the likelihood of, or opportunity for, access to unauthorised persons.

### **Maintenance**

- The CCTV System is operational 24 hours a day, every day of the year.
- The System Manager is responsible for checking and confirming that the System is properly recording and that cameras are functioning correctly, on a regular basis.
- The System is checked and (to the extent necessary) serviced annually, at least.

### **Storage of Data**

- The day-to-day management of images is the responsibility of the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.
- Images are stored for up to three months depending on the specific recorder in each building, 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.
- Where such data is retained, it is retained in accordance with the Data Protection Act 2018 and the School's Privacy Notice.

### **Access to Images**

- Access to stored CCTV images is only 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, that is pupils, parents, staff, volunteers, visitors to the school and members of the public, 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 requires specific details including at least the time, date and camera location before it can properly respond to any access requests. This right is subject to certain exemptions from access, including in some circumstances where other data subjects are identifiable.

- Any person wishing to view stored images or access the system must complete a CCTV Footage Access Request Form, Appendix 1. The System Manager must satisfy himself/herself of the legitimacy of the request and the identity of the person making 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 data subjects (or their legal representatives) on receipt of a completed CCTV Footage Access Request Form and on the basis set out above
  - To the 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 is kept in the system log including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime reference number (if applicable).

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

### **Other CCTV systems**

The School does not own or manage third party CCTV systems.

### **Complaints and queries**

Any complaints or queries in relation to this Policy or the use of CCTV within the School should be directed to the School's Data Compliance Officer, the Bursar,

#### ***Evaluation of this Policy***

*This policy will be evaluated every five years by the School, amended where necessary, and approved by SMT.*

<i>Created</i>	<i>April 2018</i>	<i>JMT</i>	<i>Version 1</i>
<i>Revised</i>	<i>September 2018</i>	<i>JMT</i>	<i>Version 2</i>
<i>Approved</i>	<i>27 September 2018</i>	<i>SMT</i>	<i>Version 2</i>
<i>Next Review</i>	<i>April 2023</i>		

**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 the retention period programmed into the Specific recorder for each building, typically 17 days or three months.

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 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.**