



This policy is called:	<b>CCTV Policy</b>
It applies to:	Lordswood Girls' School and Sixth Form Centre
Person responsible for its revision:	Premises Health & Safety Development Officer
Status:	Statutory
Website	External website and staff launch page
Approval by:	Finance & Audit Committee
Review frequency:	Annually with updates as required
Date of ratification:	7 <sup>th</sup> December 2021
Date of next review:	December 2022

## AIM

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Lordswood Girls' School, a member school of the Lordswood Trust. 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, delegated by Lordswood Trust. This policy will be subject to review annually with updates as required, and should be read in conjunction with the School's Data Protection Policy which can be found on the Lordswood Girls' School's website.

For further guidance, please review the Information Commissioner's CCTV Code of Practice which is accessible on the following link: [Guidance on the use of domestic CCTV.](#)

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 within its legitimate interests. Data captured for the purposes stated below as objectives will not be used for any commercial purpose. This CCTV system also records audio, sound recording is hampered by natural weather conditions and in many cases the sound conditions will be poor, however sound in internal areas may benefit from external conditions. Audio will be used alongside CCTV visuals where appropriate under the Information Commissioner's CCTV Code of Practice.

## 1. Objectives of the system

- To protect pupils, staff, volunteers, contractors, visitors and members of the public with regard to their personal safety
- To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, contractors, visitors and members of the public
- To support the police and community in preventing and detecting crime and to assist in the identification and apprehension of offenders
- To monitor the security and integrity of the School site and deliveries and arrivals
- To monitor and uphold discipline among pupils in line with the School Rules, which are available to parents and pupils of the School
- To monitor staff and contractors for compliance related to employment and contractual obligations
- To record system data (recorded video footage) for a set period of time to enable retrospective reviewing of any incidents where CCTV data may assist investigations.

## 2. Positioning

- Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives. The locations, at the date of writing, are listed in Appendix 1
- Adequate signage has been placed in prominent positions to inform those who enter the School premises that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.
- All fixed cameras are in plain sight on the School premises and the School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds
- No images will be captured from areas in which individuals would have a heightened expectation of privacy including, but not limited to, changing and washroom facilities.
- No images of public spaces will be captured except as background to cameras installed for a legitimate purposes such as at site entrances
- The School for the purposes of this policy includes all School grounds entered through Knightlow Road and Lordswood Road entrances, sports fields including Tennis Courts, Artificial 3G grounds pitch and all school buildings on the site.

## 3. Operation and maintenance

- The system will be operational 24 hours a day, every day of the year.
- The Premises Health & Safety Development Officer will check, or arrange checking of the system, and confirm that the system is properly recording and that cameras are functioning correctly on a regular basis.
- The system will be formally checked and to the extent necessary serviced no less than annually.
- The Premises Health & Safety Development Officer shall be the Deputy Bursar assisted by the Academy Network & Systems Manager who will provide oversight for technical support and network connectivity.

## 4. Viewing of System Data

- The following staff shall have the right to view system data at any time: - the Headteacher, Senior Leadership Team, Premises Health and Safety Development Officer and Curriculum Technical Support Co-ordinator.
- Other staff may be authorised to conduct routine viewing of system data on occasions where authorisation is provided by the Headteacher or a member of SLT.

- Checking and servicing the system and network may, from time to time, inadvertently see recordings but shall not purposefully access the system other than for the express purpose of checking and servicing the system and network
- All viewing of system data will be in a suitably secure and private area to minimise the likelihood of, or opportunity, for access by unauthorised persons
- Viewing, in this context, will include both real time and retained footage

## 5. **Storage Of Data**

- The day-to-day management of system data will be the responsibility of the Premises Health & Safety Development Officer or such suitable person as the Premises Health & Safety Development Officer shall appoint in his or her absence
- Subject to Clause 5.3, system data will be stored for no more than 30 days and automatically overwritten unless the School considers it reasonably necessary for the pursuit of the objectives outlined above to retain the system data for longer, or is lawfully required to do so by an appropriate third party such as the police or local authority. Such data shall be limited to the footage relevant to the purposes for which it is being retained
- Where such data is retained, it will be retained in accordance with legislation and the School's own Data Protection Policy and Data Retention Policy.
- Where system data is retained a log will be kept including the date, time and length of the recording, an outline of the purpose of the retention, the locations covered and where identifiable the names of groups or individuals recorded (See Appendix 3).
- All retained system data will be stored in one central, secure location determined by the Academy Networks & Systems Manager and wherever possible meet or exceed encryption and security standards recommended by ICO (Information Commissioner's Office).

## 6. **Access Data**

- Individuals 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 retained.
- In line with Subject Access Requests under GDPR, the Premises Health & Safety Development Officer must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request.
- A CCTV Data Access request Form is available (See Appendix 2)
- The following are examples when the Academy Network & Systems Manager or the the Premises Health & Safety Development Officer may authorise access to CCTV images:
  - Where required to do so by the Headteacher, 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 may be informed as part of the School's management of a particular incident;
  - To provide recordings on data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in (6.a) 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 the Headteacher believes that accessing the data will assist in achieving any of the stated objectives of the system
- A CCTV Log will be maintained to record all access requests, retained footage and viewings other than those listed in Clause 4.1 (See Appendix 3)

- Where images are disclosed under Clause 6.(c) a record will be made in the system log book including details of the person viewing the images, the time of access, the reason for viewing the images, the details of the images viewed and a crime incident or other reference number if applicable.
- Where images are provided to third parties under Clause 6.(c) above, practical steps will be taken to obscure images of non-relevant individuals.

#### **7. Other CCTV Systems**

- 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, has legitimate and direct relevance to the operations of the School or is necessary as part of an investigative or process.
- **For example**, while investigating an incident on a bus, CCTV footage from the bus CCTV system may be relevant

#### **8. Complaints and queries**

Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, including requests for copies of recordings, should be referred to the Premises Health & Safety Development Officer or the Headteacher in the first instance.

**Appendix 1 - CCTV Camera Location**

<b>Camera Channel Number Description on CCTV software</b>	<b>Camera Location</b>
<b>D1 (Main Disable Bay)</b>	<b>Main build disabled bay (Main reception)</b>
<b>D2 (Portable Toilets)</b>	<b>Grass area outside window rooms GA3 - GA4 - GA5</b>
<b>D3 (Rear 1)</b>	<b>Grass area outside window rooms GA5 - G1 - G2 - G3 - G4 - G5 - G6 - G7</b>
<b>D4 (Rear 2)</b>	<b>Grass area outside window rooms GA5 - G1 - G2 - G3 - G4 - G5 - G6 - G7 - G8</b>
<b>D5 (Rear 3)</b>	<b>Grass area outside window rooms GA5 - G1 - G2 - G3 - G4 - G5 - G6 - G7 - G8</b>
<b>D6 (Rear 4)</b>	<b>Grass area outside window rooms G8 - Garden shed</b>
<b>D7 (North Door 1)</b>	<b>Grass area outside window rooms G8 - GA8 - North Exit - Bike Shed - North netball courts</b>
<b>D8 (North Door)</b>	<b>Grass area outside window rooms G8 - GA8 - North Exit</b>
<b>D9 (Bike Sheds)</b>	<b>Grass area outside window rooms G9 - North Door Fire Exit - Bike shed</b>
<b>D10 (North Netball 1)</b>	<b>Area outside window room G9 - North Netball Courts</b>
<b>D11 (North Fire Exit)</b>	<b>Area outside External Fire Exit - Willow Tree</b>
<b>D12 (North Entrance 3)</b>	<b>Area outside window room G10 - Path alongside building - Tennis Tables - Netball Courts - Lockers - Main Hall</b>
<b>D13 (North Entrance 2)</b>	<b>Area outside window room G11 - G12 -GA10 - GA11 - Ground Floor Girls Toilets - Netball Courts - Lockers - Main Hall</b>
<b>D14 (North Entrance 1)</b>	<b>CURRENTLY OUT OF SERVICE</b>
<b>D15 (Back of Hall)</b>	<b>Area outside windows of Main Hall - G10 - Netball Courts - Sports Hall Fire Exit - Link Corridor Entrance - Stage Fire Exit - External Sports Cupboard</b>
<b>D16 (Camera 01) Link Corridor</b>	<b>Area outside windows of Main Hall - G10 - Netball Courts - Sports Hall Fire Exit - Link Corridor Entrance - Stage Fire Exit - External Sports Cupboard</b>
<b>D17 (Back of Sports Hall)</b>	<b>Back of sports hall path - Path to sixth form boiler room - Wooden safeguarding gate - netball courts</b>
<b>D18 (Camera 01) Bottom Car Park</b>	<b>Path to sixth form plant room - Half of bottom car park - Fields - Storage containers</b>
<b>D19 (Camera 01) 6th Form Courtyard</b>	<b>Sixth form main entrance - Courtyard - Fire Exit by Exams Office - Car park</b>
<b>D20 (Car park 2)</b>	<b>Wooden gate entrance to plant room and kitchen - Main car park</b>

D21 (Car park 3)	Bottom section of main car park - School House - Main electric gate - Gas meter house
D22 (Car park 1)	Top section of the main car park - skip area - path leading up to main reception
D23 (Main Gate)	Main Electric entrance gate - Main Electric pedestrian gate
D24 (Servery Sixth Form)	Sixth Form canteen area
D25 (Camera 01)	Sixth Form PE Corridor
D26 (Camera 01)	Sixth Form Social Space
D27 (Camera 01)	Foey entrance into sixth form
D28 (Camera 01)	Sixth Form Main Reception Desk - Cleaners cupboard
D29 (Main Conservatory)	Main Building New Conservatory - Main reception - Visitors waiting area
D30 (Main Reception)	Main Building Reception Area
D31 (North Door)	North Door Fire Exit - Outside classroom G8 - Outside Staff Toilets
PTZ (Moving Camera)	Panning area North Playground - Field - Artificial Grounds Pitch

#### DVR 02

Channel 1	School Entrance Driveway
Channel 2	Main Gas Meter House / Section Of Car Park
Channel 3	Internal Area of The School house - Stairs To The Ground Floor

#### DVR 03

Channel 1	Internal First Floor Library – work station area next to opening windows
Channel 2	Internal First Floor Fire Exit – Fire call point
Channel 3	Internal First Floor Library – Entrance doors into Library, bookshelf areas
Channel 4	Internal First Floor corridor outside classrooms Rooms F13, F11, F10, F9, F8, F7, Fire call point

**Appendix 2 – CCTV Data 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, this may limit the data that can be shared.

The school typically deletes CCTV recordings after 1 month.

<b>Name and address: (proof of ID may be required)</b>	
<b>Description of footage (including a description of yourself, clothing, activity etc.)</b>	
<b>Location of camera</b>	
<b>Date of footage sought</b>	
<b>Approximate time (give a range if necessary)</b>	
<b>Reason for request:</b>	

**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 aged 13 years 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.**

