

RYDES HILL PREPARATORY SCHOOL & NURSERY

P30 (ISI 7A) – CCTV POLICY



RYDES HILL

PREPARATORY SCHOOL & NURSERY

MISSION STATEMENT

- ❖ Rydes Hill Preparatory School and Nursery is a Catholic School where children learn how to live in loving relationship with God and each other.
- ❖ Christian virtues of love and justice, faith and courage, hope and perseverance are fostered.
- ❖ Pupils and staff comprise individuals of different faiths and beliefs but the Rydes Hill community aspires to unity within the life of the School based on shared moral values.
- ❖ The importance placed on the development of individual talents is at the heart of what School stands for and all are encouraged and challenged to be the best they can be.

Written By :	Alison Packman – Compliance Officer	10 th May 2019
Reviewed By :	Kathryn Pillar - Bursar	10 th May 2019
Approved By :	Sarah Norville – Headmistress	16 th May 2019
Governor Review By :	Not Required	

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Revision History

Revision	Paragraph Number	Revision
May 2018		New Policy
May 2019	Abbreviations, Acronyms and Definitions Paragraph 6 Paragraph 8 Paragraph 10 Paragraph 27 Paragraph 32 Paragraph 34 Paragraph 36	Add definition for " <i>parents</i> " Clarified Bullet point 1,2 & 7 – add "parents," Add "parents" Add "and Bursar" and change "herself" to "themselves" Bullet point 1 – delete "Policy" and replace with "Police" Bullet point 5 – add "parents" Bullet point 7 – add "or a third party," New Add "or in the event of accident or injury" Add "in accordance with our Complaints Policy"

Abbreviations, Acronyms and Definitions

Abbreviation / Acronym	Definition
CCTV	Closed Circuit Television (also known as video surveillance)
EYFS	Early Years Foundation Stage
ICO	Information Commissioner's Office
<i>parents</i>	Birth parents, adoptive parents, guardians, adults acting on behalf of parents such as au-pairs and grandparents.
SLT	Senior Leadership Team

Aim / Objective / Statement of Intent

This policy covers the whole School including EYFS.

1. This aim of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Rydes Hill Preparatory School. It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the School, contractors and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the **System**).
2. 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 P43 Privacy Notice for Parents and Pupils and/or P44 Privacy Notice for Job Applicants, Staff, Governors and Volunteers (as appropriate) and P41 Data Retention Policy.
3. For further guidance, please review the ICO CCTV Code of Practice (accessible here <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>)

General

4. All fixed cameras are in plain sight on the School premises and in the School Minibuses and the School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds. A list of the location of all of the CCTV cameras is available to staff and parents by sending a request to the Bursar, Mrs Kathryn Pillar, at bursar@rydeshill.com
5. 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.
6. Cameras will be used to monitor activities within the School buildings and grounds, School Minibuses, its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purposes of securing the safety and well-being of the school, its pupils, staff, volunteers and visitors.
7. Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Images will only be released to the media for use in the investigation of specific crime and with the written authority of the Police and the parents of any pupil who can be identified in the footage. Images will never be released to the media for purposes of entertainment.

Purpose of the System

8. The purpose of the System is as follows:-

- To protect pupils, parents, 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, parents, staff, volunteers, contractors, 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 the School site and deliveries and arrivals.
- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the expected standards of behaviour.
- To monitor the movement and behaviour of parents, volunteers, contractors, visitors and members of the public with regard to their personal safety and that of our staff and pupils.
- To track pupil movement in the event of a pupil going missing.

Positioning of Cameras

9. Locations have been selected, both inside and outside of the School buildings, and in the School Minibuses, that the School reasonably believes require monitoring to address the stated objectives. The planning and design of the CCTV installation has endeavoured to ensure that the scheme will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident which takes place in the areas of coverage.
10. Adequate signage has been placed in prominent positions to inform staff, pupils, parents, volunteers, contractors, visitors and members of the public that they are entering a monitored area and giving contact details for the school.
11. No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and toilet facilities.
12. No images of public spaces (i.e. beyond the school physical boundaries) will be captured except to a limited extent at site entrances.
13. Images and voice recordings of pupils, staff and volunteers whilst in the School Minibuses are used to monitor the behaviour of pupils and the safety of all on board.

Maintenance

14. The CCTV System will be operational 24 hours a day, every day of the year. The CCTV on the School Minibuses will be operational only when the Minibuses are in use.
15. The Deputy Bursar will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
16. The System will be checked and serviced no less than annually.

Supervision of the System

17. The scheme will be administered and managed by the Bursar, in accordance with the principles and objectives expressed in this policy.
18. Live images from the system are on permanent view in the School Office.

Storage of Data

19. Staff authorised by the School to conduct routine monitoring of live images may include the Headmistress, the Bursar, the Deputy Bursar, the Compliance Officer, the Site Manager and the School Secretaries.
20. Routine reviews of recorded images is to be limited to the Headmistress, the Bursar, the Deputy Bursar and the Site Manager.
21. When circumstances require, the Headmistress or Bursar have authority to allow other members of staff to view recorded images.
22. The day-to-day management of images will be the responsibility of the Bursar, or such suitable person as the Bursar shall appoint in her absence.
23. Images will be stored for no longer than 14 days however images may be stored in excess of this period if 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.
24. Where such data is retained, it will be retained in accordance with the Act and our Data Retention Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded.

Access to images and voice recordings

25. Access to the images or voice recordings is to be strictly controlled by a password system managed by the Bursar and will only be given to authorised persons, under the supervision of the Headmistress or Bursar, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
26. Individuals also have the right to access personal data the School holds on them, including information held on the System, if it has been kept. (Please refer to P43 Privacy Notice for Parents and Pupils and/or P44 Privacy Notice for Job Applicants, Staff, Governors and Volunteers (as appropriate) and P41 Data Retention Policy) The School will require specific details including at least a 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.
27. The Headmistress and Bursar 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 of when the Headmistress may authorise access to CCTV images or voice recordings:
- When required to do so by the Chair of Governors, the Police or some relevant statutory authority;
 - To make a report regarding suspected criminal behaviour;
 - To enable the Designated Safeguarding Lead or her appointed deputies 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 will be informed as part of the School's management of a particular incident;
 - To assist the School in establishing facts in cases of alleged unacceptable behaviour by staff, parents, volunteers, contractors, visitors or members of the public;
 - To data subjects (or their legal representatives) pursuant to a Data Subject Access Request under the General Data Protection Regulations and on the basis set out in paragraph 26 above.
 - To the School's insurance company, or a third party, where required in order to pursue a claim for damage done to insured property; or
 - In any other circumstances required under law or regulation.
28. Where images are disclosed under paragraph 27 above 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 viewed and a crime incident number (if applicable).

29. Where images are provided to third parties under paragraph 27 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.
30. A record will be maintained of the release of images to the Police or other authorised applicants. Requests by the Police can only be actioned under Section 29 of the Data Protection Act. Should images be required as evidence, a copy may be released to the Police under the evidence guidelines. Images will only be released to the Police on the clear understanding that the images remain the property of the School, and both the images and associated information are to be treated in accordance with this Policy and the relevant Privacy Notices issued by the School. The School also retains the right to refuse permission for the Police to pass the images to any other person.
31. Applications received from outside bodies (e.g. Solicitors) to view or release images will be referred to the Headmistress and/or Bursar. In these circumstances images 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. A reasonable fee can be charged in such circumstances.
32. Where access to CCTV images is requested, this request should be made to the Headmistress and/or Bursar. It will assist the School in responding promptly if the request is made via email with the subject title "Subject Access Request – CCTV footage" and providing the specific details outlined in Paragraph 26 above. Under the current statutory maximum set by Parliament the School is entitled to charge a fee of £10 for providing access to images. The School reserves the right to levy this charge where it feels it is appropriate to do so. This fee may be paid by cheque or other means agreed with the Bursar.
33. Live images can also be streamed to any computer providing the appropriate logins and passwords have been entered. There are only limited circumstances in which this might occur, for example in the event of a school lockdown, when a pupil is missing or when the site is only partially staffed such as school holidays to allow access to the premises.

Other CCTV systems

34. The 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 the School's own CCTV policy and/or other School policies.
35. On occasion the School does use coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The School may also take pupils on educational visits or to sporting fixtures or lessons where CCTV is in use (for example Surrey Sports Park for swimming lessons). The School may use these in establishing facts in cases of unacceptable pupil or staff behaviour, or in the event of accident or injury, in which case the parents/guardian or staff member will be informed as part of the School's management of a particular incident.

Complaints and queries

36. Any complaints or queries in relation to the School's CCTV system, or its use of CCTV or voice recording, or requests for copies, should be referred to the Headmistress in accordance with our Complaints Policy.