



CCTV Policy

Introduction

1. The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Kingston Grammar School (“the **School**”). It also serves as a notice and a guide to data subjects (including students, 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**”).
2. The System is administered, operated and managed by the School which acts as the Data Controller.
3. This policy will be subject to review from time to time and should be read in conjunction with the School’s Data Protection Policy and Privacy Notices.
4. For further guidance, please review the Information Commissioner’s Surveillance Camera Code of Practice.
5. All fixed cameras are in plain sight on the School premises. The School does not routinely use CCTV for covert monitoring or (as far as practically possible) monitoring of private property outside the School grounds. The School does not use surveillance systems to record sound.
6. A list of current camera locations on school premises may be available on request from the Director of Finance and Operations (DFO).
7. 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.
8. The School takes compliance with this Policy very seriously. Inappropriate use of the System or other breach of this Policy may be treated as a disciplinary matter.

Objectives of the System

9. The objectives of the System are to:
 - 9.1. Protect students, staff, volunteers, visitors and members of the public with regard to their personal safety.
 - 9.2. Protect the School buildings and equipment, and the personal property of students, staff, volunteers, visitors and members of the public.
 - 9.3. Support the police and community in preventing and detecting crime and assist in the identification and apprehension of offenders.



- 9.4. Monitor the security and integrity of the School site and deliveries and arrivals, including car parking.
- 9.5. Monitor and uphold discipline among students in line with the Behaviour Policy, including provision of evidence for use in disciplinary processes.
- 9.6. Facilitate the identification of any activities/event which might warrant disciplinary investigations and/or proceedings being taken against a member of staff, including provision of evidence for use in disciplinary and grievance processes.
- 9.7. Monitor contractors when carrying out work duties on the school site.

Positioning

10. Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.
11. Adequate signage has been placed in prominent positions to inform staff, students and visitors that they are entering a monitored area.
12. No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and toilet facilities.
13. No images of public spaces will be captured except to a limited extent at site entrances.

Maintenance

14. The CCTV System will be operational 24 hours a day, every day of the year.
15. The Facilities Manager or their authorised nominee 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 (to the extent necessary) serviced no less than annually.

Routine Monitoring

17. The System is routinely monitored by authorised members of staff only. This may include the Head, the DFO, the Deputy Heads, the Facilities Manager or their authorised nominee, the Director of IT or their authorised nominee, Reception staff and the Caretaking Team.
18. 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. Viewings will be kept to a minimum, and the System should be kept closed at other times to prevent inappropriate access to the System by others.
19. Reception staff will have access to the system to view access points to the school for the purposes of identification and authorising entry.



Storage of Data

20. The day-to-day management and storage of images will be the responsibility of the Director of IT or their authorised nominee.
21. Images will be stored for 16 days 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 or local authority.
22. Where such data is retained, it will be retained in accordance with data protection legislation and the School's Data Protection 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 in the system log book.

Access to Images

23. Access to stored CCTV images will only be given to authorised persons with prior permission from the Head or a member of the Executive.
24. Such permission should only be granted in pursuance of the above objectives, or if there is some other overriding and lawful reason to grant such access, and upon being satisfied 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 access to CCTV images may be permitted:
 - 24.1. Where required to do so by the Head, the Police or some relevant statutory authority;
 - 24.2. To make a report regarding suspected criminal behaviour;
 - 24.3. To enable the Designated Safeguarding Lead or their appointed deputy/ies to examine behaviour which may give rise to any reasonable safeguarding concern;
 - 24.4. To assist the School in establishing facts in cases of unacceptable student behaviour;
 - 24.5. To assist the Director of HR or other relevant senior staff in connection with actual or potential grievance/disciplinary investigations or proceedings;
 - 24.6. To data subjects (or their legal representatives) pursuant to a Subject Access Request and on the basis set out in paragraph 25 below;
 - 24.7. To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
 - 24.8. In any other circumstances required under law or regulation.
25. Individuals have the right to request access to personal data the School holds on them which may include CCTV images on the System. Such request will be treated as a Subject Access Request and should be made in writing in accordance with the School's Privacy Notices and Data Protection Policy. In order to locate relevant footage, any request for access to CCTV images should include the time and date of the recording, the location where the footage was captured and if necessary, information to identify the individual



concerned, eg what they were wearing. This right of access is subject to certain exemptions, including in some circumstances where others are identifiable.

26. In any circumstances 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 viewed and a crime incident number (if applicable).
27. Where images are provided to third parties, wherever practicable steps will be taken to obscure images of non-relevant individuals.

Staff Training

28. Staff who are authorised to monitor the System or access CCTV images are appropriately trained to ensure they understand the requirements of this Policy and legal requirements relating to the processing of CCTV images.

Other CCTV systems

29. 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 its Student Behaviour Policy.

Complaints and queries

30. Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Director of Finance and Operations.
31. For any other queries concerning the use of your personal data by the School, please see the School's applicable Privacy Notice.