



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 include:
 - Protection of students, parents, staff and visitors with regard to their personal safety and to act as a deterrent against crime.
 - Protection of School buildings and equipment, and the personal property of students, parents, staff and visitors from damage, disruption, vandalism and other crime.
 - To prevent and detect crime, and to support law enforcement bodies in preventing, detecting and prosecuting crime and to assist in the identification and apprehension of offenders.
 - To monitor the security and integrity of the School premises and deliveries and arrivals, including car parking.



- To monitor and uphold discipline among students in line with the Behaviour Policy, including provision of evidence for use in disciplinary processes.
- To assist in day-to-day management, including ensuring the health and safety of students, parents, staff and visitors.
- To 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.
- To assist in any civil litigation including employment or other tribunal proceedings.
- To monitor contractors when carrying out work duties on the School premises.

Positioning

10. Locations for CCTV cameras 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 around the premises to inform staff, parents, students and visitors that they are entering a monitored area, identifying the School as the controller of the CCTV system and including contact details for further information regarding the CCTV system.
12. These locations have been chosen to minimize viewing of spaces not relevant to the legitimate purposes of the School's monitoring.
13. No images will be captured from areas in which individuals would have a heightened expectation of privacy, including medical, changing and washroom facilities.
14. As far as practicably possible, CCTV cameras will not focus on private property.
15. No images of public spaces will be captured except to a limited extent at site entrances.

Maintenance

16. The CCTV System will be operational 24 hours a day, every day of the year.
17. The Facilities Manager or their authorized nominee will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
18. The System will be checked and (to the extent necessary) serviced no less than annually.

Monitoring and viewing of images by staff

19. The System is monitored by authorized members of staff only. This may include Reception, Security and IT staff as well as the Head and members of the Executive.
20. Images may also be viewed, with prior permission from the Head or a member of the Executive, by other staff whose roles require them to have access to such data. To request permission, staff should use the correct form, available here:



Form 1: <https://forms.office.com/e/LnxEf5Un0N> (to request permission)

Form 2: <https://forms.office.com/e/0QStvheFtZ> 9 (to request further extension)

21. Such permission should only be granted in pursuance of the above objectives. For example (but not limited to the following):
 - To enable the Designated Safeguarding Lead or their appointed deputy/ies to examine behaviour which may give rise to any reasonable safeguarding concern.
 - To assist the School in establishing facts in cases of unacceptable student behaviour.
 - To assist the Director of HR or other relevant senior staff in connection with actual or potential grievance/disciplinary investigations or proceedings.
22. Images will only be viewed and/or monitored in a suitably secure and private area to minimize the likelihood of or opportunity for access to unauthorized 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.

Storage of Data

23. In order to ensure that the rights of individuals recorded by the CCTV system are protected, the School will ensure that data gathered by CCTV cameras is stored in a way that maintains its integrity and security.
24. The day-to-day management and storage of images will be the responsibility of the Director of IT or their authorized nominee.
25. 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 to retain such data (for example by an appropriate third party such as the police or local authority).
26. Where such data is retained, it will be retained in accordance with data protection legislation and the School's Data Protection Policy.

Disclosure of Stored Images

27. Disclosure of stored CCTV images will only be given to other third parties with prior permission from the Head or a member of the Executive.
28. 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.
29. The following are examples of when disclosure of CCTV images may be authorized:
 - Where required to do so by the Police or any relevant local or statutory authority.
 - To make a report regarding suspected criminal behaviour or a safeguarding incident.



- To data subjects (or their legal representatives) pursuant to a Subject Access Request and on the basis set out in paragraph 30 below.
- 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.

30. Individuals have the right to request access to personal data the School holds about them which may include images on the CCTV System if they have been retained. Such request will be treated as a Subject Access Request (SAR) and should be made in writing in accordance with the School's Privacy Notices and Data Protection Policy. In order to respond to an SAR, the School will require specific details including (as a minimum) the time and date, 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.
31. 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).
32. Where images are provided to third parties, wherever practicable steps will be taken to obscure images of non-relevant individuals.

Staff Training

33. Staff who are authorized 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

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 its Student Behaviour Policy.

Complaints and queries

35. 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.
36. For any other queries concerning the use of your personal data by the School, please see the School's applicable Privacy Notice.