



ST EDWARD'S
OXFORD

Woodstock Road
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CCTV POLICY

Estates

Version:	2.2
Date:	October 2018
Person Responsible for Policy:	Estates Bursar
Approved by:	Information Technology Steering Committee (ITSC)
Review Cycle:	Annual
System Manager:	Richard Hayes (Estates Bursar)

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Introduction

The purpose of this policy is to set out the use of the Closed Circuit Television (CCTV) System at St. Edwards School. It also serves as a notice and a guide for individuals (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.

Definitions and references

- **Personal data** refers to information that relates to an identifiable, living individual i.e. data subject, including information that is classified as an identifier;
- **Data subject** means an individual including pupils, parents, staff, volunteers, visitors to the School and members of the public whom the particular personal data is about;
- **CCTV system** is referred to as ‘the System’ for this policy; and
- **St. Edward’s School** is referred to as ‘the School’ for the policy.
- **ANPR** refers to Automatic Number Plate Recognition System.

Registration as Data Controller

St Edward’s School is registered as the Data Controller with the Information Commissioner’s Office (ICO) to ensure that all personal data is stored and processed accurately, securely and purposefully in a timely manner.

Statement and scope of the policy

The System is administered and managed by the School, who acts as the Data Controller and complies with the requirements of General Data Protection Regulation (GDPR) and the Information Commissioner's CCTV Code of Practice, and should be read with reference to the School's Data Protection Policy.

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.

The School's reasons for using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the School believes these purposes are in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

Objectives of the System

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety;
- To protect School buildings and equipment, and the personal property of pupils, staff, volunteers, 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, deliveries and arrivals;
- To monitor staff and contractors when carrying out work duties; and
- To monitor and uphold discipline among pupils and assist in managing the School.
- To monitor and produce evidence in the event of accidents including RTA's.

Positioning of the Cameras

- Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.
- Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.
- No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and similar facilities.
- No images of public spaces will be captured except to a limited extent at site entrances.

ANPR

Specific fixed cameras at entrances have ANPR capability. These automatically read and record the registration numbers of vehicles as they pass and enter/leave the school grounds. The registration number and the local time is recorded on a log within the CCTV system. This log does not link registration numbers to owners.

Maintenance

- The CCTV System will be operational 24 hours a day, every day of the year.
- The System Manager or appointed personnel will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
- The System will be checked and serviced as required in accordance with manufactures recommendations.

Supervision of the System

- Staff authorised by the School to conduct routine supervision of the System may include security and other relevant staff.
- 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.

Storage and Retention of CCTV & ANPR Data

- The day-to-day management of images will be the responsibility of the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.
- Images will be stored for an approximate period of 28 days, and automatically overwritten 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. The period is capacity driven and may vary.
- Where such data is retained, it will be stored securely and in accordance with our 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 noted in the system digital narrative as a “log book” of retained recordings. Retained recordings will be deleted once a case is complete and no longer required.
- ANPR Log will be stored securely and in accordance with our Data Protection Policy. The record is an infinitely expanding list that will be emptied of its older contents not less than every two years. This data does not link registration numbers to owners. The data may be periodically uploaded and used by authorised users for security and monitoring parking purposes.

Access to Images

- Access to stored CCTV images will only be given to persons authorised by the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
- Individuals also have the right to access personal data the School holds on them (please see the Data Protection Policy and Privacy notices), including information held on the System, if it has been kept. The School will require specific details including at least to 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.
- The System Manager 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 when the System Manager may authorise access to CCTV images:
 - Where required to do so by a member of the Senior Management team, the Police or some relevant statutory authority;
 - To make a report regarding suspected criminal behaviour;
 - To enable the Designated Safeguarding Lead 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 matters of staff discipline where there is reasonable belief of serious misconduct;
 - To data subjects (or their legal representatives) pursuant to an access request;
 - 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 images are disclosed a record will be made in the system log book 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).
 - Where images are provided to third parties, wherever practicable steps will be taken to obscure images of non-relevant individuals.

Other CCTV systems

- 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.
- Many pupils travel on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The School may use these 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.

Audit and Review:

To ensure compliance with the latest data protection legislation, the School will undertake periodic audits of systems and business processes to identify areas of non-compliance or improvement.

This policy will be reviewed periodically and up dated in accordance with changes to the regulation.

Complaints and queries

Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, should be referred to the Estates Bursar.

Further Information

For further information about anything within this policy or to obtain a copy of the other policies that have been referred to within this policy, please contact the School's Estates Bursar.

Information Commissioner's CCTV Code of Practice

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

Information Commissioners Office

<https://ico.org.uk/for-organisations/guide-to-data-protection/>

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

[Some information for this policy has been acquired from the ISBA Website.](#)