SAFETY AUDIT/ MONITORING SYSTEMS: CCTV POLICY

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Watford Grammar School for Girls

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Watford Grammar School for Girls.

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.

This policy will be subject to review annually. It has been produced in line with, and should be read with reference to:

- the Data Protection Act 2018 (the **Act**) and the General Data Protection Regulation
- the School's Data Protection Policy
- the Information Commissioner's CCTV Code of Practice
- the Surveillance Camera Commissioner's Code of Practice.

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 does not use mobile CCTV cameras or Body Worn cameras.

The School's CCTV system does not capture audio recordings.

Data captured for the purposes below will not be used for any commercial purpose and only in line with the overriding objectives of the CCTV system.

The School is the Data Controller for the CCTV system on its site and identified as such in the notices posted in areas where CCTV is used. The responsible person is the Data Protection Officer, Zia Rehman, who is responsible for oversight of the operation of this policy. The person with day-to-day responsibility for the operation of the CCTV system is the named Site Manager, who is also the System Manager.

1. Objectives of the System

1.1 To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety

1.2 To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.

1.3 To support the police in preventing and detecting crime, and assist in the identification and apprehension of offenders.

1.4 To monitor the security of the site.

1.5 To monitor staff and contractors when carrying out work duties.

1.6 To monitor and uphold discipline among pupils in line with the School's promoting of good behaviour through the behaviour policy which is available to parents on the school website.

2. Camera positioning

2.1 Locations have been selected that the School reasonably believes require monitoring to address the stated objectives.

2.2 Warning signs are placed in prominent positions to inform anyone entering the area, such as pupils, staff, volunteers, visitors and members of the public that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.

2.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and toilet facilities.

2.4 No images will be captured from areas outside the boundaries of school premises.

3. Maintenance

3.1 The CCTV system will be operational 24 hours a day, every day of the year.

3.2 The System Manager (defined below) will check and confirm that the system is properly recording and that cameras are functioning correctly, on a regular basis.

3.3 The system will be checked and (to the extent necessary) serviced, annually.

3.4 At the same time as this annual review, a formal review to assess the continued need for the CCTV system will be carried out by the School.

4. Supervision of the System

4.1 Staff authorised by the School to conduct routine supervision of the System may include Site Team, Caretakers, supervisors at the Sports Centre and relevant staff on duty. All those with access to the system will be fully trained on how to carry out this responsibility.

4.2 Images will be viewed and/or monitored in a suitable environment where they cannot be accessed or inadvertently viewed by unauthorised persons

4.3 Images may be monitored live, for example for safety and security purposes, and recorded images may also be viewed, for example to pursue an investigation in response to a complaint.

5. Storage of Data

5.1 The system is administered and managed by the School, who will act as the Data Controller. The day-to-day management of images will be the responsibility of the Site Manager who will act as the System Manager, or such suitable person as the System Manager.

5.2 Images will be stored for 10 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.

5.3 Images recorded are kept in line with the School's Information Security Policy, with appropriate measures taken to prevent any unauthorised access to them.

5.4 Where such data is retained beyond the 10 day period, it will be retained in accordance with the Act and 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 recorded in the system log book, as well as the purpose for which the recording has been retained. When no longer needed for this purpose and not required for any other lawful purpose it will be deleted.

6. Access to Images

6.1 Access to stored CCTV images will only be given to authorised persons, under the supervision of the Site Manager, who have received training in the proper use of such images, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access). Any access to stored images agreed to by the Site Manager will be recorded in the system log book.

6.2 The Site 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 Site Manager may authorise access to CCTV images:

6.2.1 Where required to do so by the Headmistress, Designated Safeguarding Lead the Police or some relevant statutory authority and in accordance with the law;

6.2.2 To make a report regarding suspected criminal behaviour;

6.2.3 To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;

6.2.4 To assist the School in establishing facts in cases of unacceptable student behaviour, in which case the parents/guardians will be informed as part of the School's management of a particular incident;

6.2.5 To data subjects (or their legal representatives) pursuant to a Subject Access Request under the Act provided that the time, date and location of the recordings is furnished to the School, and in line with the School's Data Protection Policy. Please note that subjects of CCTV footage do not necessarily have the right to view images of others captured at the same time, and these images may be obscured when provided in response to a subject access request.

7. Other CCTV systems

7.1 The School may be provided by third parties with CCTV images and will manage these in accordance with the School's own CCTV policy, its Data Protection Policy and where relevant its Behaviour Policy.

7.2 For example, 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 student behaviour, in which case the parents/guardian will be informed as part of the School's management of a particular incident.

7.3 Parents are informed of this as part of the Coach Service Registration document, to which they agree when registering their son or daughter for the coach service.

8. Complaints

8.1 Any questions or complaints in relation to the School's CCTV system or its use of CCTV should be referred to the Data Protection Officer, Zia Rehman, at the School.