**Wribbenhall School**

**CCTV Policy**



Written: Spring Term 2019

Date of Next review: Autumn Term 2020

**To be read in conjunction with:**

Wribbenhall School Prospectus

**Approved by:**

Proprietor: Ellis Wells

2nd April 2019

**1. Introduction**

Wribbenhall School is situated in a residential building in a residential area. It is therefore inappropriate to erect security fencing around its perimeter. The children with in the school recognized as potentially vulnerable children. The school is also making regular use of a vehicle to transport pupils to outside activities. Therefore, we looked at alternative ways of providing security and safeguarding, both for our pupils and the public and also to assist in the prevention of theft or damage to the school or its property.

The main legislation in this area is General Data Protection Regulation 2016/679 (GDPR) and the Education (Independent School Standards) Regulations 2014. Other legislation not directly relevant to independent schools, but applicable to general principles, include the Regulation of Investigatory Powers Act 2000 and the Protection of Freedoms Act 2012.

We have notified the Information Commissioner’s Office (ICO) that Wribbenhall School operates a CCTV system.

**2. Aims of this policy**

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) System at Wribbenhall School (the School). It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the System).

The System is administered and managed by the Ellis Wells, who acts as the Data Controller. This policy is reviewed regularly and should be read with reference to the School's Data Policy and the Records Management Policy(available on our website). We conduct an annual audit and review of our use of CCTV using the checklist in Appendix 2 of the ICO's CCTV Code of Practice, <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

This was last completed in April 2019. Records are kept in the school office. 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.

**3. Objectives of the System**

3.1 To provide a safe and secure environment for pupils, staff, volunteers, visitors and members of the public.

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

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

3.4 To monitor the security and integrity of the School site and deliveries and arrivals.

3.5 To monitor and protect staff and contractors when carrying out work duties.

3.6 To monitor, protect the safety of and uphold discipline among pupils in line with the Behaviour and Discipline Policy, which is available to parents and pupils on request.

**4 Positioning**

4.1 Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.

4.2 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.

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

4.4 No images of public spaces will be captured except to a limited extent at the site entrance.

4.5 We have 10 CCTV cameras, all of which are equipped with IR night vision and are vandal and weather proof. Our main monitors are in the school office.

The cameras are listed here:

* the front drive,
* the side gate,
* the garden,
* the classroom,
* the office/first aid room,
* the kitchen,
* the front room,
* the entrance hall,
* in the vehicle rear facing including the passenger area,
* in the vehicle forward facing.

**5. Maintenance**

5.1 The CCTV System will be operational 24 hours a day, every day of the year.

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

5.3 The System will be checked and (to the extent necessary) serviced regularly.

**6. Supervision of the System**

6.1 The proprietor is trained in operating, recording and retaining images taken. He is aware of the procedure for handling requests for the disclosure of an image by individuals, where the school's procedure is set out in our data protection policy. If in doubt, the Information Commissioner would be consulted.

6.2 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.

**7. Storage of Data**

7.1 The day-to-day management of images is the responsibility of the Proprietor, who acts as the System Manager, or such suitable person as the System Manager shall appoint in his absence.

7.2 Images will be stored for 30 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.

7.3 Where such data is retained, it will be retained in accordance with the Act and our Data & Records Management Policies. Information including the date, time and length of any recording if applicable, as well as the locations covered and groups or individuals recorded, will be recorded in a log book.

The log book is kept in the School office.

**8.** **Access to Images**

8.1 Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

8.2 Individuals also have the right to access personal data the School holds on them (please see the Data Policy on our website), 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.

8.3 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 the Governor, the Police or some relevant statutory authority;
* To make a report regarding suspected criminal behaviour;
* To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour of any person 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 data subjects (or their legal representatives) pursuant to an access request under the GDPR and on the basis set out in 8.2 above;
* To the School's insurance company where required in order to pursue a claim for damage done to insured property.

8.4 Where images are disclosed under 8.3 above a record will be made in the 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).

8.5 If images are provided to third parties under 8.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

8.6 The following staff have access to the CCTV:

Ellis Wells, Proprietor and Head Teacher.

**9. 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 in line with the objectives of the School's own CCTV policy and/or its Behaviour Policy.

**10. Complaints and queries**

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 Ellis Werlls , Proprietor/Headteacher

Wribbenhall School

21 Crundalls Lane

Wribbenhall

Bewdley

DY12 1JL

Telephone: 01299 405383

**11. Other Policies**

This should be read in conjunction with our Data Policy and Records Management Policy.

Appendix 1

CCTV FOOTAGE ACCESS REQUEST

The following information is required before the school can provide copies of or access to CCTV footage from which a person believes they may be identified. Please note that CCTV footage may contain the information of others that needs to be protected, and that the school typically deletes CCTV recordings after 30 days.

Name and address:

(Proof of ID will be required)

Description of footage (including a description of yourself (your child), clothing, activity etc.)

Location of camera

Date of footage sought

Approximate time (give a range if necessary)

Signature \*………………………………………….

Pupil signature (if relevant) ………………………….

Contact Tel/Email…………………………………………

Date:…………………………………….

Print Name……………………………………………….

\* NB if requesting CCTV footage of a child under 13, a person with parental responsibility should

sign this form. For children 13 or over, the child's authority or consent must be obtained except in

circumstances where that would clearly be inappropriate and the lawful reasons to provide to the

parent(s) outweigh the privacy considerations of the child.