# CCTV Policy

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## Revision History

| Version | Date Issued | Reason for Issue |
|---|---|---|
| 1.0 | 20 June 2023 | New Policy |
| 2.0 | September 2024 | Annual Review |
| 3.0 | September 2025 | Annual Review |
| 4.0 | September 2026 | Annual Review |

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Bethany School (the School).

The system comprises of several fixed cameras located around the school site. Live images from the system are not on permanent view at any location. Recorded and live images from the
cameras can be viewed by accessing the School's IT network.

Access to the images is password protected and therefore restricted to a limited number of authorised staff (IT, Assistant Bursar, and SLT. The Head of Years, Head of Sixth Form and Orchard HM will have access to identified cameras).

Relevant guidance which has informed this Policy includes:

- The ICO Code of Practice on Privacy Notices
- The ICO Guide to Privacy Notices under GDPR
- The ICO Code of Practice on CCTV
- The ICO's Guide to Data Protection
- The ICO's Guide to the General Data Protection Regulation
- The Government's Surveillance Camera Code of Practice

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 (the System).

The System is administered and managed by the School, who act as the Data Controller. This policy will be subject to review from time to time, and should be read with reference to the School's Privacy Notice. For further guidance, please review the Information Commissioner's CCTV 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'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.

**Objectives of the System**
To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.

To protect the 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 and deliveries and arrivals, including car parking and number plate recognition.
To monitor contractors when carrying out work duties.
To monitor and uphold discipline among pupils in line with the School Rules, which are available to parents and pupils on request.

**Positioning**
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 washroom facilities.
No images of public spaces will be captured except to a limited extent at site entrances.

**Maintenance**
The CCTV System will be operational 24 hours a day, every day of the year.
The IT Department will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis. The Management of the contract for the CCTV lies with the Estates department but will be operated by the IT Department.
The System will be checked and (to the extent necessary) serviced no less than annually.

**Supervision of the System**
Staff authorised by the School to conduct routine supervision of the System may include night security / out of hours facilities, supervisors at the sports centre and relevant staff on duty.
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 of Data**
Images will be stored for 31 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. Where such data is retained, 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 by the GPDR officer.

**Access to Images**

Access to stored CCTV images will only be given to authorised persons, under the supervision of the IT Department, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access). Ultimate decision making lies with the Headmaster.

Individuals also have the right to access personal data the School holds on them (please see the School's Privacy Notice, 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 IT Department 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 IT Department may authorise access to CCTV images:

Where required to do so by the Headmaster, 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 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 Act and on the basis set out in the Privacy Notice policy.

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 under 6.3 above 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).

**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 School Rules.

Many pupils travel to School on School buses and 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.

**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 The Headmaster.

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