

Egerton Rothesay School

CCTV Policy

Introduction

A CCTV (Closed Circuit Television) system is in operation at Egerton Rothesay School. This policy sets out our requirements for the management and use of the CCTV system.

The policy also details how CCTV footage will be used; to whom it may be disclosed and how to handle requests from third parties to ensure that Egerton Rothesay School meets its obligations under Data Protection Legislation.

Scope

The policy applies to all Egerton Rothesay School employees, parents, and any outside contractors and visitors.

Principles

Egerton Rothesay School will operate the use of CCTV in accordance with the requirements set out in Section 2 of the Data Protection Act.

- the data will be obtained and processed fairly.
- the data will be kept only for a specified and lawful purpose.
- the data will not be used or disclosed in any manner incompatible with that purpose.
- the data will be adequate, relevant, and not excessive in relation to that purpose.
- if requested in writing, an employee will be given a copy of the data which concerns them.
- the data will be kept safe and secure.
- the data will be accurate and kept up to date.

Purpose

Egerton Rothesay School operates CCTV for one or more of the following purposes:

- to maintain the security of the premises;
- to protect persons on the premises including employees, parents, outside contractors, and visitors.
- to assist in the identification and prosecution of persons in relation to any criminal matters and for the purpose of taking disciplinary action for a serious breach of discipline.
- to maintain health, safety, and environmental safety in the workplace. Data may be used for the purpose of accident investigations.
- to investigate complaints.

CCTV recording is not in place to monitor employee performance; however, it may be used as evidence as part of a legitimate management concern for reasonable and proper cause (approved by the Head or Bursar), e.g. during an investigation of a disciplinary matter, grievance, or appeal hearing.

Maintenance

The CCTV system is maintained by a third-party contract company under an annual maintenance contract.

The contractor is responsible for:

- ensuring that as a company it complies with its responsibilities in relation to guidance on the location of the cameras.
- ensuring that the date and time references are accurate.
- ensuring that suitable maintenance and servicing is undertaken so that clear images are recorded, and the cameras are kept in full working order.

Location

The location of CCTV cameras in operation at Egerton Rothesay School is as follows:

- Main front entrance
- Back doors (by the PE changing rooms)
- Back gate entrance

The school will ensure that there is prominent signage to let individuals know that a CCTV system is in operation inside and outside the school. The signs will be clearly visible and readable.

Type of Equipment

The CCTV cameras record visual images only not sound.

Data Access Requests

Any person whose image is recorded on the CCTV system has a right to seek and be supplied with a copy of their own personal data from the footage. To exercise this right, an application should be made in writing, addressed to the Bursar. The Bursar has the right to charge an administration fee in response to such a request and will respond within 40 calendar days of the request. All data requests will be recorded.

When making a request for access to CCTV footage the person making the request should provide the school with a reasonable indication of the timeframe for the recording i.e. the approximate time and the specific dates on which the image was recorded.

It is not reasonable or practicable to make a request for all footage held for an individual.

If a recording no longer exists on the day a request is received, it will not be possible to provide a copy. Persons making a request for footage should be aware that data is erased after 30 days.

The data requested will be provided where possible in digital format to be viewed on a PC/lap top or similar device. In circumstances where the footage cannot be copied to another device the school will provide still images as an alternative.

Disclosure

Disclosure will only be granted:

- if it is fair to the individuals
- if there is a legal obligation

- it is consistent with the purpose for which the system was established.
- if access or disclosure is denied the reason will be documented by the Bursar.

Please note that disclosure may be authorised to law enforcement agencies if withholding it would prejudice the prevention or detection of a crime.

Image Storage, Viewing and Retention

The Bursar/DPO will be the recognised Data Controller, with overall responsibility for CCTV data.

Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific dates and times to be identified.

Access will be restricted to members of the Leadership team and recorded images may only be viewed in a restricted area.

In the event that footage is to be used for the purposes of an investigation and /or a disciplinary process, the footage will be made available on request to the relevant employee or their representative.

The school reserves the right to use images captured on CCTV where there is activity the school cannot be expected to ignore such as criminal, serious disciplinary misconduct or behaviour that puts others at risk and for the purpose of investigating complaints by staff, pupils or parents.

The CCTV images will normally be retained for 30 days. Once this period has expired, the images are removed or erased, unless the footage is used as evidence as part of an investigation, disciplinary or appeal hearing.

The school also reserves the right to carry out covert monitoring if management believes that criminal or other serious malpractice is taking place. The monitoring will only be used as part of a specific investigation with the permission of the Leadership team. Monitoring will stop as soon as the investigation is complete

Any misuse of recorded images or the viewing of images without the prior approval of the Leadership team may lead to disciplinary action.

Policy approved by: Alison Walker (on behalf of Governing Body) Date: 22 September 2021 Next Review (latest): September 2023
