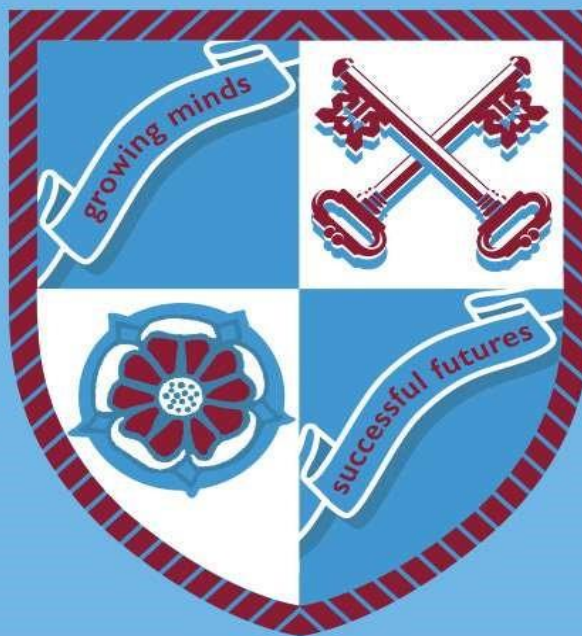




Warblington
School

Growing minds, successful futures

CCTV POLICY



Reviewed by: Headteacher

Approved by: Governing Body

Date: September 2022

Next review due: September 2024

The System is administered and managed by Warblington School, which acts as the Data Controller. 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 use CCTV for covert monitoring or monitoring of private property outside the School grounds.

Warblington School's purposes for using the CCTV system are set out below and, having fully considered the privacy rights of individuals, Warblington 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 students, staff, volunteers and visitors with regard to their personal safety.
- To protect the school buildings and equipment, and the personal property of pupils, staff, volunteers and visitors.
- To monitor and uphold discipline among pupils in line with the Pastoral Care, Behaviour and Behaviour policy.
- To monitor the security and integrity of the school site and deliveries and arrivals, including
- To Safeguard staff and contractors when on site.

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

The System will be checked and serviced no less than annually.

Supervision of the System

Staff authorised by the school to conduct routine supervision of the System may include Caretakers, IT staff 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

The day-to-day management of images will be the responsibility of the Network Manager who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.

Images will be stored for 30 days, and automatically deleted, 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 our Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered and the reason for recording.

Access to Images

Access to stored CCTV images will only be granted in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

All CCTV access requests must first be submitted through the IT Helpdesk and approved.

Unsupervised access to stored CCTV images will only be permitted to the following authorised persons: Head Teacher, Site Staff, SLT, Heads of Year, IT support Team or such persons as may be temporarily acting in these roles (for example covering for absence).

For all other persons within the organisation, access to stored CCTV images will only be given with the specific authorisation of one of the aforementioned persons, or the System Manager, and under their direct supervision.

For persons outside of the organisation, authorisation must come from the Head, the Designated Safeguarding Leads, or the Data Protection Lead, and access must be under their direct supervision or that of the System Manager.

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 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, or other authorising person detailed above, 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 it is appropriate to authorise access to CCTV images:

- Where required to do so by the Head, 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
- To data subjects (or their legal representatives) pursuant to an access request on the basis set out above;
- In any other circumstances required under law or regulation.

Where images are disclosed or accessed, a record will be made in the system log book (Helpdesk) 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). This log book is held by the IT Department so all other authorised parties must inform them if they access stored images on the System.

Where images are provided to third parties, wherever practicable, steps will be taken to obscure images of non-relevant individuals.

Complaints and queries

Any complaints or queries in relation to the School's CCTV system, its use of CCTV, or requests for copies, should be referred to the Data Protection Lead/Head Teacher.

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