



Elizabeth College CCTV Policy 2018

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television Systems at both Elizabeth College Upper School and the Junior Schools. 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 Data Protection Policy (please see school website for more info).

All fixed cameras (exterior and in computer rooms) 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.

At present, cameras are located at:

Upper School

- 22 x Exterior cameras monitoring all entrances to EC and most routes through the campus
- Sports Hall Entrance
- Ozanne Computer Room
- Cottage Computer Room (Upstairs)
- Cottage Computer Room (Downstairs)
- Winchester DT Computer Room
- Ozanne Computer Room
- Art Computer Room
- AJP Computer Room
- Colborne Music Computer Room

Junior School

- 14 x Exterior cameras monitoring all entrances to both Beechwood and Acorn House and most routes through the campus
- Acorn House Entrance

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.

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, visitors and members of the public.

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

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

1.5 To monitor and uphold discipline among pupils.

2. Positioning

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

2.2 Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area.

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

2.4 No images of public spaces will be captured except to a limited extent at site entrances.

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 no less than annually.

4. Access to the System

4.1 Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access by unauthorised persons.

5. Storage of Data

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

5.2 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 border agency.

5.3 Where such data is retained, it will be retained in accordance with the schools 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 CCTV Register.

6. Access to Images

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

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

6.3 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 of when the System Manager may authorise access to CCTV images:

6.3.1 Where required to do so by the Bursar, the Police or some relevant statutory authority;

6.3.2 Following suspected criminal behaviour;

6.3.3 To enable the Designated Safeguarding Lead (VP(P)) to examine behavior which may give rise to any reasonable safeguarding concern;

6.3.4 To assist the School in establishing facts in cases of unacceptable pupil behavior, in which case, the parents/guardian may be informed (depending on severity) as part of the School's management of a particular incident;

6.3.5 To the School's insurance company where required in order to pursue a claim for damage done to insured property; or

6.3.6 In any other circumstances required under law or regulation.

6.4 Where images are disclosed under 6.3 above a record will be made in the system register including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed.

7. Other CCTV systems

7.1 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.

7.2 Many pupils travel to School 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 pupil behavior, in which case the parents/guardian may be informed (depending on severity) as part of the School's management of a particular incident.

8. Data Export

8.1 Data is exported to the Police when they "compel" the College to do so as part of a Police investigation, and they provide a receipt note which makes clear their responsibility for handling the data in accordance with the Data Protection Law.

8.2 Data exported internally to the College will be accompanied by a statement, either e-mail or in writing, that the recipient is responsible for managing the data in accordance with the Data Protection Law.

9. Complaints and Queries

9.1 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 Bursar.

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 may be required)

Description of footage (Including a description of yourself, clothing, activity etc.)

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Location of camera

Date of footage sought

Approximate time (give a range if necessary)

Signature*

Print Name

Date

* 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