

WOLVERHAMPTON GRAMMAR SCHOOL

CCTV POLICY

INTRODUCTION

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Wolverhampton Grammar School (the School). 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 Notices.

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 operates two separate internal and external CCTV Systems. A list of camera locations on the School premises is available on request.

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, volunteers, 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 staff and contractors when carrying out work duties.
- 1.6 To monitor and uphold discipline among pupils in line with the School Rules, which are available to parents and pupils on request.
- 1.7 To comply with the School's Premises Licence in monitoring the sale of alcoholic drinks at internal and external events.

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, identifying the School as the Data Controller and giving contact details for further information regarding the system.

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 Managers (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. Supervision of the System

4.1 Staff authorised by the School to conduct routine supervision of the System may include the Estates Staff and IT Staff and any other relevant staff on duty.

4.2 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.

5. Storage of Data

5.1 The day-to-day management of images will be the responsibility of the System Manager/s, or such suitable person as the System Manager/s shall appoint in their absence.

5.2 Images will be stored for 30 days on the external System and between 14 and 30 days on the internal System at which point it will be 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.

5.3 Where such data is retained, it will be retained in accordance with the Act and our Data Retention Guide and Privacy Policies. 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.

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/s, 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 Privacy Notices), 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/s 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/s may authorise access to CCTV images:
- 6.3.1 Where required to do so by the Head, the Police or some relevant statutory authority;
 - 6.3.2 To make a report regarding suspected criminal behaviour;
 - 6.3.3 To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
 - 6.3.4 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;
 - 6.3.5 To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 6.2 above;
 - 6.3.6 To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
 - 6.3.7 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 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).
- 6.5 Where images are provided to third parties under 6.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

7. Other CCTV systems/Single Use Cameras

- 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 is in line with the objectives of the School's own CCTV policy and/or its School Rules.
- 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 behaviour, in which case the parents/guardian will be informed as part of the School's management of a particular incident.
- 7.3 Single use cameras may be used for functions/School Events/Marketing, these images are protected and covered by the Privacy Notice Policies and Use of Images of Children Policy and may be kept for the purposes stated in those Policies.

8. Complaints and queries

- 8.1 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 System Manager/s in writing to the School or by email.

8.2 The internal System Manager is Paul Hancox, Systems Director. Email: pgh@wgs-sch.net

8.3 The external System Manager is Tony French, Estates Manager. Email: tjf@wgs-sch.net

Please also refer to the following policies:

Health and Safety Policy – Staff network and website	Safeguarding Policy – Staff network and website
Staff Code of Conduct – Website and Employment Manual	Security, Access Control and Workplace Safety – Staff network and website
Privacy Notice for Pupils and Parents – Staff network and website	Privacy Notice for Staff – Employment Manual
Privacy Notice for Alumni, Friends and Supporters – Staff network and website	Taking, Using and Storing of Images Policy - Staff network and website
Risk Assessment Policy – Staff network and website	

Monitoring and Evaluation of this policy

The School monitors and evaluates its CCTV Policy through the following activities:

- Record keeping of training records for staff in data protection
- Review of regulatory compliance by F&GP Committee
- Review of concerns and complaints registers by SMT and Board of Directors
- Review of safeguarding register by Head and Designated Safeguarding Director

PCR
September 2018

Next Review:
September 2019