



CCTV Policy – whole Foundation

(including any footage from vehicles fitted with dash cams)

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Key – “CCTV” referred to in this policy may also include any footage from vehicles fitted with dash cams”.

I. Purpose of Policy

The Seckford Foundation (the Foundation) uses CCTV cameras to view and record pupils, residents, parents, staff and visitors on and around our premises. We recognise that the images and audio of individuals recorded by CCTV cameras are personal data which must be processed in accordance with data protection laws.

The purpose of this policy is to:

- Outline why and how we will use CCTV, and how we will process personal data recorded by CCTV cameras;
- Ensure that the legal rights of our pupils, residents, parents, staff and visitors relating to their personal data are recognised and respected; and
- Assist staff in complying with relevant legal obligations when working with personal data.

A breach of this policy may, in appropriate circumstances, be treated as a disciplinary matter. Following investigation, a breach of this policy may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

The CCTV system is administered and managed by the Foundation, which is the controller in respect of personal data collected by our CCTV cameras. If you have any questions about this policy, please contact the Director of Operations.

This policy will be subject to review from time to time and should be read with reference to the Foundation's Data Protection Policy. We will also review the ongoing use of existing CCTV cameras regularly to ensure that their use remains necessary and appropriate, and that the system is continuing to address the needs that justified its introduction.

2. Objectives of System

The Foundation's purposes for using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the Foundation believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

- To protect pupils, residents, parents, staff and visitors with regard to their personal safety, to prevent harm, for safeguarding purposes and to act as a deterrent against crime.
- To protect the Foundation buildings and equipment, and the personal property of pupils, residents, parents, staff and visitors from damage, disruption, vandalism and other crime.
- To prevent and detect crime, and support law enforcement bodies in the prevention, detection and prosecution of crime as well as the identification and apprehension of offenders.
- To monitor the security and integrity of the Foundation site and deliveries and arrivals, including car parking and number plate recognition.
- To monitor staff and contractors when carrying out work duties.

- To monitor and uphold discipline among pupils in line with the School's rules, which are available to parents and pupils on request.
- To assist in day-to-day management, including ensuring the health and safety of pupils, residents, parents, staff and visitors.
- To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
- To assist in civil litigation, including employment tribunal proceedings.

3. Positioning

Locations for the CCTV cameras have been selected, both inside and outside our premises, that the Foundation reasonably believes require monitoring to address the above objectives.

Adequate signage has been placed in prominent positions around the premises to inform pupils, residents, parents, staff and visitors that they are entering a monitored area, identifying the Foundation as the controller operating the CCTV system and including contact details for further information regarding the CCTV system.

These locations have been chosen to minimise viewing of spaces not relevant to the legitimate purposes of the Foundation's monitoring. As far as practically possible, CCTV cameras & audio monitoring will not focus on private property (and/or in conjunction with use of video blanking); and no images or audio of public spaces will be captured except to a limited extent at site entrances. In addition, surveillance systems will not capture images or audio from areas in which individuals would have a heightened expectation of privacy, including medical, changing and washroom facilities.

4. Maintenance

The CCTV system will be operational 24 hours a day, every day of the year.

Authorised personnel will check and confirm that the CCTV system is properly recording and that cameras are functioning correctly, on a regular basis.

The CCTV system will be checked and (to the extent necessary) serviced no less than annually by the in-house IT team.

5. Supervision

We will ensure that recorded images and audio are only viewed by approved members of staff whose roles require them to have access to such data. This may include the Head of People and safeguarding / pastoral staff. Staff using the CCTV system will be given appropriate training to ensure that they understand and observe the legal requirements related to the processing of relevant data.

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

6. Storage

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered by CCTV cameras is stored in a way that maintains its integrity and security. Given the large amount of data generated by the CCTV system, we may store video footage using a cloud computing system. We will take all reasonable steps to ensure that any cloud service provider maintains the security of our information, in accordance with industry standards. We may also engage data processors to process data on our behalf. We will ensure appropriate contractual safeguards are in place to protect the security and integrity of the data.

Images and audio will be stored for 30 days and permanently removed unless the Foundation considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required to retain such data (for example, by an appropriate third party such as the police or local authority).

Where personal data collected by the CCTV system is retained, it will be held in accordance with data protection law and our Data Protection Policy.

7. Requests for disclosure

Individuals have the right to request access to personal data that the Foundation holds about them (otherwise known as a “subject access request”, on which please see the Privacy Notice for the relevant site (Woodbridge School or Seckford Care) and Data Protection Policy for further information), including information collected by the CCTV system, if it has been retained.

In order to respond to a subject access request, the Foundation will require specific details including (as a minimum) the:

- Time;
- Date;
- Camera location; and
- Why the requester would like to view it.

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 Foundation must also be satisfied as to the identity of the person wishing to view stored images and audio and the legitimacy of their request.

No images or audio from our CCTV cameras will be disclosed to a third party without express permission being given by the Foundation. The following are examples of circumstances in which the Foundation may authorise disclosure of CCTV images and audio to third parties:

- Where required to do so by the police or any relevant local or statutory authority;
- To make a report regarding suspected criminal behaviour or a safeguarding incident;

- To enable the Designated Safeguarding Lead or their appointed deputy to examine pupil 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 pupil's parents/guardian will be informed as part of the School's management of a particular incident;
- To individual data subjects (or their legal representatives) pursuant to a subject access request (as outlined above);
- To the Foundation's insurance company where required in order to pursue a claim (for example for damage to insured property); or
- In any other circumstances required under law or regulation.

Where images or audio are disclosed, a record will be made in the system logbook including the person viewing the images or audio, the time of access, the reason for viewing the images or audio, the details of images or audio viewed and a crime incident number (if applicable).

When considering disclosure of CCTV footage the Foundation reserves the right to

- Obscure images and audio of third parties;
- Invite the requester to view the images or audio in our offices;
- Limit the number of viewings; and/or
- Refuse a request to view CCTV images or audio.

where we consider it necessary to do so.

8. Compliance and Monitoring arrangements

This policy will be subject to a thorough review process including consideration by the Health and Safety Committee on an annual basis. This will ensure that practice across the Foundation is in line with this policy, the Complaints procedure and with current guidance and legislation.

Appendix I

CCTV FOOTAGE ACCESS REQUEST

The following information is required before the Foundation 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.)	
Location of camera	
Date of footage sought	
Approximate time (give a range if necessary)	
Why are you requesting to view this footage?	

Signature*.....

Print Name.....

Date

*** NB if requesting CCTV footage of a child under 12, a person with parental responsibility should sign this form. For children over that age, 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.**