



**King's
Worcester**

**CCTV
Policy**



Purpose

To regulate the management and operation of the Closed Circuit Television (CCTV) System at King's School Worcester, King's St. Alban's and King's Hawford (the Foundation). It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the foundation 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 foundation, 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 foundation's Data Protection Policy. For further guidance, please review the Information Commissioner's CCTV Code of Practice.

All fixed cameras are in plain sight on the foundation premises and the foundation does not routinely use CCTV for covert monitoring or monitoring of private property outside the foundation grounds. Where cameras cover third party property within their view that third party property is obscured as far as is reasonably practicable within the CCTV software.

The foundation's purposes of 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.

Objectives of the System

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- To protect the foundation buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- To support the police and community in preventing and detecting crime and assist in the identification and apprehension of offenders.
- To monitor the security and integrity of the foundation site and deliveries and arrivals, including car and number plate recognition.
- To protect staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the School Rules, which are available to parents and pupils on request.

Positioning

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

Adequate signage has been placed in prominent positions, at all entrance points to the foundation, to inform staff and pupils that they are entering a monitored area, identifying the foundation as the Data Controller.

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 and adjacent walkways, pavements and roadsides.

Maintenance

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

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.

Supervision of the System

Staff authorised by the Foundation to conduct routine supervision of the system may include the Director of Operations, Estates Manager(s), Caretaker(s), Senior Leadership Team 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 Estates 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 the duration available on the system hard drive (normally 2-4 weeks) 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 local authority.

Where such data is retained, it will be retained in accordance with the Data Protection Act and our 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 system log.

Access to Images

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

Individuals also have the right to access personal data the foundation holds on them (please see the foundation's Data Protection Policy), including information held on the system, if it has been kept. The foundation will require specific details including at least the 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 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 may authorise access to CCTV images:

1. Where required to do so by the Headmaster, Heads', Director of Operations, the Police or some relevant statutory authority
2. To make a report regarding suspected criminal behaviour
3. To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern

4. To assist the foundation in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian will be informed as part of the foundation's management of a particular incident
5. To data subjects (or their legal representatives) pursuant to an access request.
6. To the foundation's insurance company where required in order to pursue a claim for damage done to insured property; or
7. In any other circumstances required under law or regulation.

Where images are disclosed under item 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).

Where images are provided to third parties under item 3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

Other CCTV systems

The foundation 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 foundation's own CCTV policy and/or its School Rules.

Many pupils travel to the foundation on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The foundation 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 foundation's management of a particular incident.

Complaints and queries

If you have any queries or complaints concerning the foundation's use of CCTV, your personal data, or any question about this Policy, please contact the foundation's Director of Operations by:

Email: compliance@ksw.org.uk

Telephone: 01905 721721

Post: The King's School, 5 College Green, Worcester, WR1 2LL

Review

This policy will be reviewed by the Director of Operations annually or at more frequent intervals if there are relevant legislative changes, and/or the evaluation of the policy highlights the need for a review.

Authorised by	Resolution of the Governors
Signature	
Date:	25 March 2022
Effective date of the Policy	19 January 2022
Review date	01 March 2023
Circulation	Members of Governors/ all staff / parents / pupils [on request]