



**King's
Worcester**

**CCTV
Policy**



Purpose

The King's School, Worcester (the Foundation) uses CCTV cameras to view and record pupils, parents/guardians, staff and visitors on and around our premises. We recognise that the images 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, parents/guardians, 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.

The CCTV System (the system) is administered and managed by the Foundation, which is the Data 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.

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.

Objectives

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, staff and visitors with regard to their personal safety and to act as a deterrent against crime
- To protect the Foundation buildings and equipment, and the personal property of pupils, parents/guardians, 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 and as well as the identification and apprehension of offenders
- To monitor the security and integrity of the Foundation sites 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/guardians and pupils on request
- To assist in day-to-day management, including ensuring the health and safety of pupils, parents/guardians, 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.

Please note that this list is not exhaustive and other purposes may become relevant from time to time.

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, pupils, parents/guardians and visitors that they are entering a monitored area, identifying the Foundation as the Data Controller 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 will not focus on private property; and no images of public spaces will be captured except to a limited extent at site entrances and adjacent walkways, pavements and roadsides. In addition, surveillance systems will not be used to record sound and no images will be captured from areas in which individuals would have a heightened expectation of privacy, including medical, changing and washroom facilities.

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.

The CCTV system will be checked and (to the extent necessary) serviced no less than annually.

Supervision

We will ensure that recorded images are only viewed by approved members of staff whose roles require them to have access to such data. This may include the Estates Manager(s), Caretaker(s), Senior Leadership Team and relevant staff on duty. Staff using the system will be given appropriate training to ensure that they understand and observe the legal requirements related to the processing of relevant data.

Images 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.

Storage

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.

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 will be stored for the duration available on the system hard drive (normally 2-4 weeks) and automatically over-written unless the Foundation 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 personal data is retained, it will be held in accordance with the Data Protection Act 2018 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.

Requests for Disclosure

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 request access to personal data that the Foundation holds about them (otherwise known as a "subject access request", please see the Foundation's Data Protection Policy for further information), including information collected by the 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 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 Foundation must also be satisfied to the identity of the person wishing to view stored images and the legitimacy of the request.

No images 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 when the Foundation may authorise disclosure of CCTV images to third parties:

- Where required to do so by the Foundation Head, Prep School Heads', 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 his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern
- 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
- 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 done to insured property); or

- In any other circumstances required under law or regulation.

Where images are disclosed, 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).

The Foundation reserves the right to obscure images of third parties when disclosing CCTV footage, where we consider it necessary to do so.

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 in relation to the Foundation's use of CCTV, your personal data, requests for copies, 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 Adopted:	22 March 2024
Revised on:	06 March 2024
Review due	01 February 2025
Circulation	Members of Governors/ all staff / parents / pupils [on request]

Review Notes

Policy checked to the latest ISBA standards published September 2023.