

Longacre School Closed Circuit Television (CCTV) Policy

Policy updated: January 2025 Policy to be reviewed: January 2026

Aim

1. The aim of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Longacre 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).

Introduction

- 2. The System is administered and managed by the School, which is the controller in respect of personal data collected by the CCTV cameras. This policy will be subject to review from time to time and should be read with reference to the School's Data Protection Policy.
- 3. 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.

Objectives of the System

- 4. These are as follows:
 - a) To protect pupils, parents, staff, volunteers, visitors and members of the public with regard to their personal safety and act as a deterrent against crime;
 - b) To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public;
 - c) To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders;
 - d) To monitor the security and integrity of the School site and deliveries and arrivals, including car parking, for example by utilising number plate identification;
 - e) To monitor staff and contractors when carrying out work duties;
 - f) To monitor and uphold discipline among pupils in lie with the School's rules and policies;
 - g) To assist in day-to-day management, including ensuring the health and safety of pupils, parents, staff and visitors.
 - h) To assist in the effective resolution of disputes which arise during disciplinary or grievance proceedings;
 - i) To assist in civil litigation, including employment tribunal proceedings.

Positioning

- 5. Locations have been selected that the School reasonably believes require monitoring to address the stated objectives. All fixed cameras are in plain sight around the School premises. The cameras are listed here:
 - Entrance Gate (Hullbrook Lane)
 - Entrance to the School House and nearby road area
 - Quad Left
 - Quad Right
 - Sports Field
 - Bottom Car Park (Staff)
 - Reception waiting area inside the School House
 - Exit Gate (Stonards Brow)
- 6. Adequate signage has been placed in prominent positions to inform staff, pupils, parents and visitors that CCTV is in operation around the School.
- 7. The School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds.
- 8. No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- 9. No images of public spaces will be captured except to a limited extent at site entrances.

Maintenance

- 10. The CCTV System will be operational 24 hours each day, every day of the year.
- 11. Authorised personnel will check and confirm that the CCTV system is properly recording and that cameras are functioning correctly, on a regular basis.
- 12. The System will be checked annually and (to the extent necessary) serviced every year.

Supervision of the System

13. Staff authorised by the School to conduct routine supervision of the System may include Estates staff, IT staff, members of SLT and relevant staff on duty. Images will be viewed and / or monitored in a suitable area to minimise the likelihood of or opportunity for access to unauthorised persons.

Storage of data

- 14. The day-to-day management of images will be the responsibility of the IT Manager.
- 15. Images will be stored for 28 days and automatically over-written unless the School considers it reasonably necessary to retain recorded data for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.
- 16. Where such data is retained, it will be retained in accordance with data protection law and the School Data Protection Policy.

Access to Images and requests for disclosure

- 17. Access to live CCTV images from all cameras occurs throughout the day as needed by relevant members of staff. This is in order to help fulfil the objectives of the system, as set out in paragraph 5 of this document.
- 18. Access to stored CCTV images will only be given to authorised persons, under the supervision of an appropriate member of the School staff, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access). Access to such images can only be given under the authorisation of the Head or Bursar.
- 19. Individuals also have the right to request access to personal data the School holds on them (please see the Data Protection Policy and the School's Privacy Notice), including information held on the System, if it has been kept. The School 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.
- 20. The School must satisfied as to 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 School may authorise disclosure of CCTV images to third parties:
 - a) Where required to do so by the Head, Bursar, the Police or some relevant statutory authority;
 - b) To make a report regarding suspected criminal behaviour or a safeguarding incident;
 - c) To enable the Designated Safeguarding Lead or an appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
 - d) 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;
 - e) To individual data subjects (or their legal representatives) pursuant to an access request as outlined above;
 - f) In assisting with the identification of 'car damage' and other acts that are detrimental to the school;
 - g) To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
 - h) In any other circumstances required under law or regulation.
- 21. 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).
- 22. The School reserves the right to obscure images of third parties when disclosing CCTV footage, it is considered necessary to do so.

Other CCTV systems

- 23. 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 and / or its terms and conditions.
- 24. Where pupils travel on coaches provided by third party contractors for School trips, 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.

Complaints and queries

25. 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 Head.

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 28 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)	
Reason for Request	
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.