



CCTV AND MINIBUS DASHBOARD CAMERA PRIVACY POLICY

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System and the minibus dashboard cameras at Redmaids' High 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 and the minibus dashboard camera 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 Data Protection Policy (accessible here <https://www.redmaidshigh.co.uk/about-us-school-policies>). For further guidance, please review the Information Commissioner's CCTV Code of Practice (accessible here <https://ico.org.uk/about-the-ico/ico-and-stakeholder-consultations/cctv-code-of-practice-revised/>).

Closed Circuit Television System

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'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 within the parameters outlined in clause 6.3.

1.6 To monitor and uphold discipline among pupils in line with our behavioural policies and associated codes of conduct, which are available to parents and pupils on request.

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 ICT Systems Manager (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 day or night security, supervisors at the sports centre and 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 ICT Systems Manager, who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.

5.2 Images will be stored for 8 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.

5.3 Where such data is retained, it will be retained in accordance with the Act, our Privacy Notices for Staff, Students and Parents and our Information and Records Retention 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 book.

6. Access to Images

6.1 Access to stored CCTV images will only be given to authorised persons, under the supervision of the ICT Systems Manager and the DFO, 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 Data Protection Policy and/or Privacy Notices), including data held on the System, if it has been kept. The School will require specific details including at least 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 following are examples when the System Manager may authorise access to CCTV images:

6.3.1 Where required to do so by the Head, Headteacher, DFO, 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 a subject 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). The log book is maintained in IT Support Services.

- 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.

Minibus Dashboard Cameras.

A camera is fitted to all Redmaids' High School minibuses. These will record footage from the front of the vehicle once the vehicle ignition is switched on and all the while the vehicle is in motion, they will also record should an impact occur on the vehicle whilst it is stationary and unattended.

7. Objectives of the System

- 7.1 To assist the School in defending members of staff should traffic related allegations or road traffic incident be reported.
- 7.2 To assist the School in making successful insurance claims against our own insurance company and that of any third-party claims.
- 7.3 To support members of staff in understanding any remedial training required post incident, in order to ensure a full return of duties of any School staff member involved in an incident.

8. Positioning

- 8.1 The cameras will record all activity in front of the minibus, whilst the bus is stationary with the ignition turned on. Whilst the vehicle is in motion it will once again record all activity within its range in front of the vehicle. Subsequently it will record images of Redmaids' High School pupils, staff and members of the general public (pedestrians and other road users). Adequate signage has been placed in a prominent position at the rear of minibuses.

9. Maintenance

- 9.1 The ICT Systems Manager (defined below) will check and confirm that the cameras are properly recording and that cameras are functioning correctly, on a regular basis.
- 9.2 There will be regular checks by the System Manager to ensure that all SD cards are present

10. Supervision of the System

- 10.1 Staff authorised by the School to conduct routine supervision of the cameras may include maintenance staff and relevant staff on duty.
- 10.2 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.

11. Storage of Data

- 11.1 The day-to-day management of images will be the responsibility of the Transport Supervisor, who will act as the System Manager, or such suitable person as the System Manager shall appoint in his absence.
- 11.2 Video and audio footage of the vehicle journeys will be stored on a SD card held within the camera. The SD card will be replaced with a 'clean' card each month. The removed data will only be reviewed if required to support an allegation or incident.
- 11.3 The removed SD card from the camera will be stored securely in a locked office by the School for a period of 1 month. Data will therefore be stored for a total of 8 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.
- 11.4 Where such data is retained, it will be retained in accordance with the Act, our Privacy Notices for Staff, Students and Parents and our Information and Records Retention 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 book.

12. Access to Images

- 12.1 Access to stored CCTV images will only be given to authorised persons, under the supervision of the ICT Systems Manager and DFO, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
- 12.2 Individuals also have the right to access personal data the School holds on them (please see the Data Protection Policy and/or Privacy Notices), including information held on the System, if it has been kept. The School will require specific details including at least time, date and minibus 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.
- 12.3 The following are examples when the System Manager may authorise access to minibus dashboard camera images:
 - 12.3.1 Where required to do so by the Head, Headteacher, the Police or some relevant statutory authority;
 - 12.3.2 To make a report regarding suspected criminal behaviour;
 - 12.3.3 To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
 - 12.3.4 To data subjects (or their legal representatives) pursuant to a subject access request under the Act and on the basis set out above;

- 12.3.5 To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
- 12.3.6 In any other circumstances required under law or regulation.
- 12.4 Where images are disclosed under 12.3 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). The log book is maintained by the maintenance team.
- 12.5 Where images are provided to third parties under 12.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.
- 12.6 All staff will be made aware that access to the dashboard camera footage is prohibited and that the SD card must never be removed or the camera unplugged as this would constitute a data breach

13. Other CCTV systems

- 13.1 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 behaviour policies or associated codes of conduct.
- 13.2 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.
- 13.3 The School is not able to access dash camera footage taken from a vehicle that visits the school site, including if the vehicle belongs to a member of staff.

14. Complaints and queries

- 14.1 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 our Compliance Officer. They can be contacted at privacy@redmaidshigh.co.uk or by telephoning the school office.

Kate Doarks/Paul Dwyer/Lisa Brown/Richard Bacon April 2021

Review date April 2021

CCTV OR MINIBUS DASHBOARD CAMERA FOOTAGE ACCESS REQUEST

The following data is required before the school can provide copies of or access to CCTV or minibus dashboard camera footage from which a person believes they may be identified.

Please note that CCTV or minibus dashboard camera footage may contain the data of others that needs to be protected, and that the school typically deletes CCTV or minibus dashboard camera recordings after 8 weeks.

Name and address: (proof of ID will be required)	
Description of footage (including a description of yourself, clothing, activity etc.)	
Location of camera or minibus	
Date of footage sought	
Approximate time (give a range if necessary)	

Signature*.....

Print Name.....

Date

*** NB if requesting 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.**