



ESTABLISHED 1906

Lord's Independent School

Closed Circuit Television Policy and Procedure

Review Schedule: Annual

Lord's Independent School

Reviewed August 2023

Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed-circuit television (CCTV) camera system at Lord's School.

The school has various CCTV systems in operation comprising a number of fixed cameras in key areas and position.

This Policy follows Data Protection Act guidelines and will be subject to regular review.

Objectives of the CCTV schemes

- To increase personal safety of staff, pupils, visitors and clients and reduce the fear of crime.
- To protect the school building.
- To support the Police in a bid to deter and detect crime.
- To assist in identifying, apprehending, and prosecuting offenders.
- To assist in managing the school and its grounds and what takes place therein.

Statement of intent

The CCTV schemes are registered with the Information Commissioner under the terms of the Data Protection Act 2018 and will seek to comply with the requirements both Data Protection Act and the Commissioner's CCTV Code of Practice.

The school will treat the systems and all information, documents and recordings obtained and used as data which is protected by the Act.

Cameras will be used to monitor activities within the school buildings, grounds controlled by Lord's School. They will be used to identify criminal activity anticipated, perceived to be, or actually occurring, and for the purpose of securing the safety and well-being of the schools' pupils, staff and its visitors.

Responsible persons have been instructed that static cameras are not to focus on private homes, gardens, and other areas of private property.

CCTV will not be used specifically for monitoring the work of employees, parents, and visitors. CCTV evidence may be used in the event that the facts of an incident need to be clarified or in disciplinary proceedings, against an employee where such evidence tends to show, in the reasonable belief of the employer, that the employee has been guilty of misconduct. The employee or other individual e.g. parents, (perhaps with their child) involved in the matter/incident will be given the chance to see and respond to the images in these circumstances.

Covert CCTV will only ever be set up for the investigation or detection of crime or serious misconduct. The use of covert CCTV will be justified only in circumstances where the investigator has reasonable suspicion that the crime or serious misconduct is taking place and where CCTV use is likely to be a proportionate means of securing evidence. The use of covert CCTV can only be authorised by the Head teacher.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Images will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design of the CCTV systems has endeavoured to ensure that the systems will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner, have been placed at all access routes to areas covered by the CCTV.

Operation of the system

The day-to-day management will be the responsibility of the relevant responsible person for the system.

The CCTV systems will be operated 24 hours each day, every day of the year.

The relevant responsible person for the system will be required to regularly check and confirm the efficiency of the system and in particular that the equipment is properly recording and that cameras are working.

An impact assessment of each of the systems will be conducted by the relevant responsible person upon installation or moving of cameras.

Image monitoring procedures

Image monitoring may be maintained at all times.

Viewing of live images on monitors will be restricted to those responsible unless the monitor displays a scene which is also in plain sight from the monitor location.

Cameras will be pointed and focused on several points/areas agreed by the relevant responsible person. Only the relevant responsible person will modify or authorise the modification of camera positions.

Image storage procedures

The responsible person for each CCTV system will ensure that the images are only held for a maximum of 31 days and are then overwritten. On occasions the images may be retained for longer when required for evidential purposes, in which case they will be retained until no longer needed.

Access to the stored images will be strictly controlled by a password system managed by the relevant manager.

When circumstances require, the relevant responsible person will have authority to allow other members of staff to view recorded images.

Images may be viewed by the Police for the prevention and detection of crime, or by the insurers if a claim has been made against the school. Requests by the Police will only be actioned if required by law. Should images be required as evidence, a copy may be released to the Police under their evidence guidelines.

Images will only be released to the Police on the clear understanding that they remain the property of the school, and both the disk or file and information contained on it are to be treated in accordance with this policy. The school will also retain the right to refuse permission for the Police to pass to any other person the disk or any part of the information contained thereon.

Breaches of the Policy (including breaches of security)

Any breach of the CCTV Policy by staff will be investigated.

Complaints

Any complaints about the school's CCTV camera system or application of this policy should be addressed in writing to the Head teacher marked "Re:CCTV"

Public Information

This policy will be made available to the public on the school website.

Access by the Data Subject

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to see data held about themselves, including those obtained by CCTV. Requests for Data Subject Access, specifically relating to CCTV, should be made to the Head of Compliance in writing either using the Data Subject Access Request Form, see appendix 4, or providing the information requested in the form. Applicants will receive a response within 40 calendar days of the date the request was received by the school.