G7 CCTV Policy

The Purcell School is committed to using its Closed Circuit Television System (CCTV) to protect the safety of students and staff. All reasonable steps will be taken in School to fulfil these responsibilities within the framework of:

- Data Protection Act 2018
- Education (Independent School Standards) Regulations 2014.
- The ICO Guide to Privacy Notices under GDPR
- The ICO Guide to Practice on CCTV
- The ICO Guide to Data Protection
- The Government's Surveillance Camera Code of Practice

The purpose of this policy is to regulate the management and operation of the CCTV System at The Purcell School (the **School**). It also serves as a notice and a guide to data subjects (including students, 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**).

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

For further guidance, please review the Information Commissioner's CCTV Code of Practice (accessible here).

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

a. To protect students, staff, volunteers, visitors and members of the public with regard to their personal safety
b. To protect the School buildings and equipment, and the personal property of students, 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.
e. To monitor staff and contractors when carrying out work duties.
f. To monitor the arrival and departure of visitors and deliveries to the site by the School Office
g. To monitor and uphold discipline among students in line with the School Rules, which are available to parents and students on request.

2. Positioning

a. Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.
b. Adequate signage has been placed in prominent positions to inform staff and students that they are entering a monitored area,
c. No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities. Where CCTV is installed within boarding houses, it is positioned such that no private bedrooms, washrooms or changing facilities are captured. Only public areas (such as common rooms and corridors) are monitored.
d. No images of public spaces will be captured except to a limited extent at site entrances.

3. Maintenance

a. The CCTV System will be operational 24 hours a day, every day of the year.
b. The IT Manager will check and confirm that the System is properly recording and that the cameras are functioning correctly, on a regular basis and arrange for repairs and maintenance as necessary.

4. Supervision of the System

a. Staff authorised by the School to access the System via replay are SLT and IT Manager. Staff in the School Office have access to view the system so they can control access to the building and deliveries.
b. 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

a. Footage will be retained on a cyclical basis. When the hard drive is full the oldest data is automatically over-written. During term-time this is approximately every three weeks during the School holidays longer.
b. Where data is retained relating to a particular event or incident, it will be retained in accordance with the 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 on the summary spreadsheet which is held by the IT Manager

6. Access to Images

a. Access to stored CCTV images will only be given to authorised persons in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
b. Individuals also have the right to access personal data the School holds on them (please see the Data Protection Policy), 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.
c. The relevant member of SLT 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 where access to CCTV images may be allowed:

i. Where required to do so by the Principal, the Police or some relevant statutory authority;
ii. To make a report regarding suspected criminal behaviour;
iii. To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
iv. To assist the School in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardian will be informed as part of the School's management of a particular incident;
v. To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 6.2 above;
vi. To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
vii. In any other circumstances required under law or regulation.

7. Other CCTV Systems

a. 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.

8. Complaints and Queries

a. 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 Bursar.

Policy author/reviewer:	***Policy date/review date:***	***Next review due:***
Jo Wallis	January 2020	January 2021
Adam Wroblewski	September 2021	September 2022
Adam Wroblewski	September 2022	September 2025
Adam Wroblewski	September 2025	September 2028