



CCTV Policy

This policy covers the Senior and Prep Schools and EYFS

Governors' Committee normally reviewing policy	Governing Body
Date policy formally approved by Governors	October 2021
Period of review	1 Year
Last review date	August 2026
Next review date	August 2027

Person responsible for monitoring implementation and effectiveness of the policy	Head
Other relevant policies	Safeguarding Policies General Policies

Kingsley School Bideford is owned and operated by KSI Schools Group Limited, which is the School's Proprietary Body ("the Proprietor").

Any reference in this policy to the Governors or Governing Body means the School's local body of governors, which operates as a local advisory board on behalf of the Proprietor. The local governing body does not constitute the Proprietary Body of the School.

The Proprietor has ultimate responsibility for ensuring that the School meets its statutory and regulatory obligations and for ensuring that this policy is appropriate, effective and implemented in accordance with those requirements.

The Governors provide local oversight and scrutiny on behalf of the Proprietor and undertake appropriate review and monitoring to satisfy themselves that this policy is being implemented effectively. They advise and make recommendations to the Proprietor and the School's leadership as appropriate.

The core principle that guides everything we do is **Putting Students First**.

Purpose of this Policy

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Kingsley 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, which acts 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.

Objectives of the System

To protect students, staff, volunteers, visitors and members of the public with regard to their personal safety and to act as a deterrent against crime.

To protect the School buildings and equipment, and the personal property of students, staff, volunteers, visitors and members of the public from damage, disruption, vandalism and other crime.

To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.

To monitor the security and integrity of the School site and deliveries and arrivals.

To monitor and uphold discipline among students in line with the School's Behaviour policy which is available to parents and students on request.

To enhance safeguarding practices in remote parts of the school and in areas where adults may be working one-to-one with children.

To minimise the risk of child-on-child abuse as defined in Keeping Children Safe in Education.

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 School reasonably believes require monitoring to address the stated objectives.

Adequate signage has been placed in prominent positions to inform staff, students and visitors that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.

No images will be captured from areas in which individuals would have a heightened expectation of privacy, including medical, changing and individual washroom cubicles.

No images of public spaces will be captured except to a limited extent at site entrances and parts of the school grounds.

Maintenance

The CCTV System will be operational 24 hours a day, every day of the year.

The IT Manager will check and confirm to the Head that the System is properly recording and that cameras are functioning correctly, on a regular basis.

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

Supervision of the System

Staff authorised by the School to conduct routine supervision of the System include Security and IT contractors. Reception and Houseparents have limited access to carry out routine supervision of areas specific to them.

Recorded images are only viewed by approved members of staff whose roles require them to have access to such data. This may include security, safeguarding and pastoral/house staff.

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.

Storage of Data

The day-to-day management of images will be the responsibility of the IT Manager, or such suitable person as they shall appoint in their absence.

Images will be stored for 14 days, and are 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.

Where such data is retained, 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 in the system log book.

Access to Images

Access to stored CCTV images will only be given to authorised persons, under the supervision of the IT 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 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 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 IT Manager 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 when the IT Manager may authorise access to CCTV images:

Where required to do so by the Head, the Police or some relevant statutory authority may access data;

- 1.1.1 To make a report regarding suspected criminal behaviour;
- 1.1.2 To enable the Designated Safeguarding Lead or their appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- 1.1.3 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;

- 1.1.4 To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out above;
- 1.1.5 To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
- 1.1.6 In any other circumstances required under law or regulation.

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).

Where images are provided to third parties under 6.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

Other CCTV systems

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 other relevant school policies.

Complaints and queries

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 Compliance Lead.

RJ Pavis
Head