



CCTV Policy

Last Reviewed: June 2021

Policy Owner: Data Protection Officer

Policy Statement

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) System at Lyndhurst 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).

The system is administered and managed by Lyndhurst 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 which can be found on the Lyndhurst School website.

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

The School's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, Lyndhurst School believes these purposes are all within its legitimate interests. Data captured for the purposes stated below as objectives will not be used for any commercial purpose.

This is a whole school policy and applies to all members of Lyndhurst School.

Associated Policies and Documents

- Data Protection Policy
- Early Years Staying Safe Policy

Key Roles and Responsibilities

The Governors have ultimate responsibility for ensuring that the Data Protection Act is complied with. They have delegated the day-to-day responsibility to the Headmaster and his staff to ensure that the school's obligations are met in practice.

Responsibilities of the Data Protection Officer (DPO)

- To check and confirm that the system is properly recording and that cameras are functioning correctly on a regular basis.



- To maintain viewing logs are filled in correctly
- To oversee any Data Subject Request Forms are dealt with appropriately and within time constraints

Objectives of the system

- To protect pupils, staff, volunteers, contractors, visitors and members of the public with regard to their personal safety.
- To protect the school buildings and equipment, and the personal property of pupils, staff, volunteers, contractors, visitors and members of the public.
- To support the police and community in preventing and detecting crime and to 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 pupils in line with Lyndhurst School Rules, which are available to parents and pupils.
- To monitor staff and contractors for compliance related to employment and contractual obligations.
- To record system data (recorded video footage) for a set period of time to enable retrospective reviewing of any incidents where CCTV data may assist investigations.

Positioning

Locations have been selected that Lyndhurst School reasonably believes require monitoring to address the stated objectives. The locations, at the date of writing, are listed in Appendix 1.

Adequate signage has been placed in prominent positions to inform those who enter the school premises that they are entering a monitored area, identifying Lyndhurst School as the Data Controller and giving contact details for further information regarding the system.

All fixed cameras are in plain sight on the school premises and Lyndhurst School does not routinely use CCTV for covert monitoring or monitoring of private property outside the school grounds.

No images will be captured from areas in which individuals would have a heightened expectation of privacy including, but not limited to, changing, washroom facilities and bedrooms.

No images of public spaces will be captured except as background to cameras installed for legitimate purposes such as at site entrances

The School for the purposes of this policy includes all the school grounds within our perimeter to include the Main Building, Millennium Building, Little Lyndhurst, Deacon Hall and other properties owned or managed by Lyndhurst School.



Operation

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

The system will be checked regularly and to the extent necessary serviced/repaired as needed.

The DPO assisted by the Bursar will provide oversight for obtaining technical support and network connectivity via the IT contractors as needed

Viewing of System Data

The following staff shall have the right to view system data at any time: - the Chair of Governors, the Headmaster, the Deputy Head, the Bursar, the Head of Early Years and the DPO.

Other staff may be authorised to conduct routine viewing of system data on occasions where authorisation is provided by the Headmaster, Deputy Head or Bursar.

Staff checking and servicing the system and network may, from time to time inadvertently see recording but shall not purposefully access the system other than for the express purpose of checking and serving the system and network

All viewing of system data will be in a suitably secure and private area to minimise the likelihood of or opportunity for access by unauthorised persons

Viewing, in this context, will include both real time and retained footage.

Storage of Data

- The day-to-day management of system data will be the responsibility of DPO or such suitable person as the Bursar in his or her absence.
- Subject to Clause 5.3, system data will be stored for no more than 30 days and deleted unless the Lyndhurst School considers it reasonably necessary for the pursuit of the objectives outlined above to retain the system data for longer or is lawfully required to do so by an appropriate third party such as the police or local authority. Such data shall be limited to the footage relevant to the purposes for which it is being retained.
- Where such data is retained, it will be retained in accordance with legislation and Lyndhurst School's own Data Protection Policy which includes guidance of Data Retention.
- Where system data is retained, a log will be kept including the date, time and length of the recording, an outline of the purpose of the retention, the locations covered and where identifiable the names of groups or individuals recorded (See Appendix 3).



- All retained system data will be stored in one central, secure location determined by the DPO and SLT and wherever possible meet or exceed encryption and security standards recommended by ICO.

Access to Data

- Individuals have the right to access personal data Lyndhurst School holds on them (please see the Data Protection Policy), including information held on the system, if it has been retained.
- In line with Subject Access Requests under GDPR, the DPO must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request.
- A CCTV Data Access request Form is available (See Appendix 2)
- The following are examples when the DPO may authorise access to CCTV images:
 - Where required to do so by the Head, the Police or some relevant statutory authority.
 - To make a report regarding suspected criminal behaviour.
 - To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern.
 - To assist Lyndhurst School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian may be informed as part of The School's management of a particular incident;
 - To provide recordings on data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 6.2 above.
 - To Lyndhurst School's insurance company where required in order to pursue a claim for damage done to insured property; or
 - In any other circumstances required under law or regulation.
 - Where there is, in the Headmaster's opinion, a belief that accessing the data will assist in achieving any of the stated objectives of the system.
- A CCTV Log will be maintained to record all access requests, retained footage and viewings other than those listed in Clause 4.1 (See Appendix 3)
- Where images are disclosed under Clause 6.3 a record will be made in the CCTV Viewing Log 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 or other reference number if applicable.
- Where images are provided to third parties under Clause 6.3 above, practical steps will be taken to obscure images of non-relevant individuals.

Other CCTV systems

Lyndhurst School does not own or manage any 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, has legitimate and direct relevance to the operations of the school or is necessary as part of an investigative or process.

For example, while investigating an incident on a bus, CCTV footage from the bus CCTV system may be relevant.

Complaints and queries

Any complaints or queries in relation to Lyndhurst School's CCTV system, or its use of CCTV, or requests for copies, should be referred to the DPO or Bursar in the first instance at Lyndhurst School, 36 The Avenue, Camberley, Surrey, GU15 3NE.

Appendix 1 – CCTV Camera Locations

Camera Number	Location
1	Front of The School – mounted on Millennium Building by bin store
2	Kitchen Door
3	Outside Year 1 Classroom
4	Playground – mounted on Millennium Building
5	Art Room Entrance
6	Hall – mounted above music room window
7	Headmaster's Garden
8	Tennis Court
9	Early Years – mounted on side of Changing Rooms
92	External Door of The School Secretary's Office (overseeing side gate)
94	Front Little Lyndhurst – mounted above Reception door
95	Rear of Little Lyndhurst – mounted above patio doors
96	Rear Door Little Lyndhurst
97	Side Gate Little Lyndhurst

This list is current as of June 2021 but may not be exhaustive or accurate as cameras are installed, removed or moved from time to time for operational reasons.

Appendix 2 – CCTV Data Access Request

The following information is required before Lyndhurst 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 Lyndhurst School typically deletes CCTV recordings after 30 days.



Name and Address (photographic proof of ID will 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 footage of a pupil under 13, a person with parental responsibility should sign this from. For pupil's 13 or over, the pupil'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 pupil.



Appendix 3 – CCTV Viewing Log

Camera No.	Date	Time	Viewed by	Date of viewed footage	Time of viewed footage	Length of viewed footage	Reason	Footage saved in secure location?	Data Subject if Request ID no.	Crime no applicable