



Norfolk House School

# CCTV Policy

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## **1. Introduction**

- 1.1. This is the CCTV Policy of Norfolk House School (**School**).
- 1.2. The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at the School.
- 1.3. 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).
- 1.4. The System is administered and managed by the School, which acts as the Data Controller.
- 1.5. This policy will be subject to review from time to time, and should be read with reference to the School's Data Protection Policy and Privacy Notices. For further guidance, please review the Information Commissioner's CCTV Code of Practice.
- 1.6. 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.
- 1.7. The School's purposes in 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.

## **2. Scope and application**

- 2.1. This policy applies to the whole School including the Early Years Foundation Stage (**EYFS**).

## **3. Regulatory framework**

- 3.1. This policy has been prepared to meet the School's responsibilities under:
  - 3.1.1. Data Protection Act 2018 and General Data Protection Regulation (GDPR)
  - 3.1.2. Education (Independent School Standards) Regulations 2014;
  - 3.1.3. *Statutory framework for the Early Years Foundation Stage* (DfE, Sept 2021);
  - 3.1.4. Education and Skills Act 2008;
  - 3.1.5. Children Act 1989;
  - 3.1.6. Childcare Act 2006;
  - 3.1.7. Equality Act 2010.

3.2. The following School policies, procedures and resource materials are relevant to this policy:

3.2.1. Data Protection Policy

3.2.2. Safeguarding and Child Protection Policy;

3.2.3. Equal Opportunities Policy;

3.2.4. Special Educational Needs Policy;

3.2.5. Anti Bullying Policy;

3.2.6. Admissions Policy;

3.2.7. Behaviour and Discipline Policy;

3.2.8. Accessibility Plan;

3.2.9. Risk Assessment Policy for Pupil Welfare;

3.2.10. Complaints Policy.

#### **4. Publication and availability**

4.1. This policy is published on the School website and in the Virtual Staffroom.

4.2. This policy is available in hard copy on request.

#### **5. Definitions**

5.1. Where the following words or phrases are used in this policy:

5.1.1. references to the **Proprietor** are references to the Board of Directors of Norfolk House School Limited;

#### **6. Responsibility statement and allocation of tasks**

6.1. The Proprietor has overall responsibility for all matters which are the subject of this policy.

6.2. To ensure the efficient discharge of its responsibilities under this policy, the Proprietor has allocated the following tasks:

<b>Task</b>	<b>Allocated to</b>	<b>When / frequency of review</b>
Keeping the policy up to date and compliant with the law and best practice	Office Manager	As required, and at least termly

<b>Task</b>	<b>Allocated to</b>	<b>When / frequency of review</b>
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	“ “ “	As required, and at least termly
Seeking input from interested groups (such as pupils, staff, parents) to consider improvements to the School's processes under the policy	“ “ “	As required, and at least every 2 years
Formal review	Proprietor, Headmistress, Office Manager	Every 2 years

## **7. Objectives of the system**

7.1. The objectives of the CCYV system are as follows:

- 7.1.1. to protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety;
- 7.1.2. to protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public;
- 7.1.3. to support the police and community in preventing and detecting crime, and to assist in the identification and apprehension of offenders;
- 7.1.4. to monitor the security and integrity of the School site and deliveries and arrivals, including car parking;
- 7.1.5. to monitor staff and contractors when carrying out work duties; and
- 7.1.6. to monitor and uphold discipline among pupils in line with the School's policies on behaviour, which are available to parents and pupils on request.

## **8. Maintenance**

- 8.1. The CCTV System will be operational 24 hours a day, every day of the year.
- 8.2. The System Manager (defined below) will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
- 8.3. The System will be checked and (to the extent necessary) serviced no less than annually.

## **9. Supervision of the system**

- 9.1. The Staff authorised by the School to conduct routine supervision of the System will include the Headmistress, Office Manager and Receptionist.
- 9.2. 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.

## **10. Storage of data**

- 10.1. The day-to-day management of images will be the responsibility of Headmistress who will act as the System Manager, or such suitable person as she will appoint in her absence.
- 10.2. Images will be stored for 35 days, 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.
- 10.3. Where such data is retained, it will be retained in accordance with data protection legislation 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.

## **11. Access to images**

- 11.1. Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
- 11.2. Individuals also have the right to access personal data the School holds on them (please see the School's Privacy Notices), including information held on the System, if it has been kept. The School will require specific details including at least to 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.

- 11.3. The System Manager must satisfy herself 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 System Manager may authorise access to CCTV images:
- 11.3.1. Where required to do so by the Police or some relevant statutory authority;
  - 11.3.2. To make a report regarding suspected criminal behaviour;
  - 11.3.3. To enable a Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
  - 11.3.4. 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;
  - 11.3.5. To data subjects (or their legal representatives) pursuant to an access request under data protection legislation;
  - 11.3.6. To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
  - 11.3.7. In any other circumstances required under law or regulation.
- 11.4. Where images are disclosed, 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).
- 11.5. Where images are provided to third parties, wherever practicable steps will be taken to obscure images of non-relevant individuals.

## **12. Other CCTV systems**

- 12.1. 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 policies on safeguarding and behaviour.

### **13. Complaints and queries**

- 13.1. 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 the Headmistress.
- 13.2. For any other queries concerning the use of your personal data by the School, please see the School's applicable Privacy Notice.

### **14. Training**

- 14.1. The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff and volunteers understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.
- 14.2. The level and frequency of training depends on role of the individual member of staff.
- 14.3. The School maintains written records of all staff training.
- 14.4. Staff will be trained to understand the types of disabilities and how to deal with pupils who are disabled. Staff will not be expected, unless medically qualified or trained, to administer medication.

### **15. Risk assessment**

- 15.1. Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.
- 15.2. The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused. Please see clause 6 for details of the individuals with responsibility for carrying out, monitoring, implementing and reviewing the effectiveness of risk assessments under this policy.

### **16. Record keeping**

- 16.1. All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.
- 16.2. The information created in connection with this policy may contain personal data. The School's use of this personal data will be in accordance with data

protection law. The School has published privacy notices on its website which explain how the School will use personal data.

#### **17. Version control**

Date of adoption of this policy	21.6.21
Date of last review of this policy	13.10.22
Date for next review of this policy	11.10.23
Policy owner (SLT)	Headmistress
Policy owner (Proprietor)	Chair of Directors