



## CCTV POLICY

This policy will be reviewed annually or in response to changes in legislation		
Created	April 2018	Head of HR
Last Review	October 2023	Head of Compliance and Health & Safety, IT Director, Logistics Manager, Maintenance Manager, IT Operations Manager
Approved	October 2023	Operations Board

This Policy applies to all year groups at Thomas's Schools, including the EYFS.

Thomas's London Day Schools operates as a united group of schools with a similar ethos and values and as such is referred to as a singular body.

This policy should be read in conjunction with the Thomas's Data Protection Policy, Health & Safety Policy, ICT Acceptable Use Policy, Information Security Policy, Online Safety Policy, Personal Devices and Photography Policy, Privacy Notices, Safeguarding and Child Protection Policy and Staff Code of Conduct.

### **INTRODUCTION**

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Thomas's London Day Schools (the 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 the School, who act as the Data Controller. For further guidance, refer to the ICO's CCTV Code of Practice.

All fixed cameras are in plain sight on the School premises and school minibuses, and the School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds. The CCTV systems do not record audio.

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**

The objectives of using CCTV is as follows:

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- To protect the School buildings, vehicles and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- 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 staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the School Rules, which are available to parents and pupils on request.

## **ROLES AND RESPONSIBILITIES**

- Head of Compliance and Health & Safety: responsible for ensuring that the policy is followed, that coverage is relevant and legitimate. Authorises requests for access and exports of footage, and authorises deletion of exported footage.
- Logistics Manager: Authorises requests for access and exports of footage. Provides access and carries out exports of authorised recordings (Battersea only) .
- System Manager: responsible for installation and maintenance of cameras. Ensuring cameras are all working and any arranging remedial action identified. The System Manager maintains records of the location of cameras.
  - Fixed Locations: Maintenance Manager
  - Vehicles: Transport Management
- IT Team: Supports installation and provides access and carries out exports of authorised recordings.
- School Office, Security and Caretaking staff: able to view live footage on designated terminals

## **PROCEDURES**

### *1. Positioning*

- 1.1 Fixed Locations: Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.
- 1.2 Vehicles: Each Thomas's minibus has three cameras installed to protect pupils and staff and monitor and uphold discipline among pupils.
- 1.3 Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.
- 1.4 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- 1.5 No images of public spaces will be captured except to a limited extent at site entrances.

### *2. Maintenance*

- 2.1 The CCTV System will be operational 24 hours a day, every day of the year.
- 2.2 The System Manager will check and confirm that the Systems are properly recording and that cameras are functioning correctly, on a regular basis.

- 2.3 The System will be checked and (to the extent necessary) serviced no less than annually.
- 2.4 The System Manager is supported by the IT team
- 3. *Supervision of the Systems*
  - 3.1 Staff authorised by the School to conduct routine supervision of the System may include the Operations Director, System Manager, Logistics Manager and School Senior Leadership Team.
  - 3.2 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.
- 4. *Storage of Data*
  - 4.1 The day-to-day management of images will be the responsibility of the IT team.
  - 4.2 Images will be stored for at least 14 days and no longer than 30 days and will be automatically overwritten 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.
  - 4.3 Footage from the minibuses is recorded onto SD cards. The SD cards are replaced each month and the footage is retained for 30 days before being deleted.
  - 4.4 The IT Team will ensure that all exports of recordings are deleted after 30 days unless required as outlined in the point above. The IT Team will request confirmation from the Head of Compliance and Health & Safety before deleting any exports or recordings.
  - 4.5 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 export request forms.
- 5. *Access to Images*
  - 5.1 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).
  - 5.2 No footage should be accessed or exported without the appropriate form and authorisation received in advance
    - 5.2.1 Requests for access to view footage should be submitted via the [CCTV System Access Request Form](#) (on MSP) which will be reviewed and authorised by the Head of Compliance and Health & Safety or Logistics Manager.
    - 5.2.2 Requests to export recorded footage should be submitted via the [CCTV System Export Request Form](#) (on MSP) must be completed before any footage is exported. The Head of Compliance and Health & Safety or Logistics Manager will review and authorise requests.
  - 5.3 The Head of Compliance and Health & Safety or Logistics Manager may consult with the Principals, Head or Operations Director prior to authorising a request to view or export footage.
  - 5.4 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.

5.5 The Head of Compliance and Health & Safety or Logistics 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 access to CCTV images may be authorised:

- 5.5.1 Where required to do so by the Principals, Head, Operations Director, the Police or some relevant statutory authority;
- 5.5.2 To make a report regarding suspected criminal behaviour;
- 5.5.3 To enable the Designated Safeguarding Lead or deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- 5.5.4 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;
- 5.5.5 To data subjects (or their legal representatives) pursuant to an access request under the Act;
- 5.5.6 To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
- 5.5.7 In any other circumstances required under law or regulation.

5.6 Exports of authorised recordings will be stored in a central folder with permissions restricted to the IT team and Logistics Manager. Permission will be assigned to individual recordings for appropriate individuals to view.

5.7 Exports of recordings will be deleted in line with section 4 above.

## 6. *Other CCTV systems*

6.1 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 School Rules.

6.2 Some pupils travel to School on coaches provided by third party contractors and these coaches may be equipped with CCTV systems. Where fitted, the School may use these 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.

## 7. *Complaints and queries*

7.1 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 Head of Compliance and Health & Safety by email at [compliance@thomas-s.co.uk](mailto:compliance@thomas-s.co.uk).

## **LEGISLATION AND GUIDANCE**

This policy pays due regard to the following statutory guidance and other government advice.

UK Data Protection Act (2018)

UK General Data Protection Regulation (UK GDPR)

## APPENDIX 1: CCTV Export storage and deletion

Where exports of CCTV footage are required:

- Footage is exported locally to the CCTV software and then saved to the CCTV Storage. A link to the storage is on the [Thomas's Systems Page](#).
  - A new folder should be created for each incident within the school folder
  - Files named using the convention: YYYYMMDD\_CCTV\_Footage\_Original
- Where footage is required from a minibus, the SD card will be removed from the minibus and the footage exported to the CCTV Storage
- The original export is deleted from the CCTV software / retained on SD card for maximum of 30 days
- If required, the file is converted to an MP4 (and pre-converted file deleted)
- Where images require redacting, the original and redacted copies of the footage are retained
- The IT Team, Operations Director, Head of Compliance and Health & Safety and Logistics Manager have access to the CCTV Storage by default.
- Other users are given access on request to view footage via a link
- Where footage is shared with external individuals, the IT Director will generate a password protected link with an expiration of 10 days.

### **Retention**

- Footage will be stored for no longer than 30 days unless the School considers it reasonably necessary as outlined below, or if lawfully required by an appropriate third party such as the police or local authority.
- Dates of deletion are assigned by the Head of Compliance and Health & Safety to the CCTV Export spreadsheet
- The Head of Compliance and Health & Safety will submit a request to the IT helpdesk for a deletion to be completed. This provides evidence of destruction.
- Subject Access Requests are retained for 6 months following the completion of the request.
- Police Requests are retained for 30 days after sharing unless specified by the Police
- Insurance claims (not involving the school) are retained for 21 days after sharing
- Potential insurance claims or litigation are retained for 60 days or for the period of the claim