



CCTV Policy

Policy number	BS017
Applies to	Whole School
Endorsed by	Vice Master
Responsibility	DFO
Date reviewed	March 2023
Next review	March 2024

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Bedford School, a member school of the Harpur Trust. 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, delegated by the Harpur Trust. 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 School's 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, the 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.

- **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 the School Rules, which are available to parents and pupils of the School
- To monitor staff and contractors for compliance related to employment and contractual obligations

- **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 those who enter the School premises 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, but not limited to, changing, washroom facilities and bedrooms.

- No images of public spaces will be captured except as background to cameras installed for a legitimate purposes such as at site entrances
- The School for the purposes of this policy includes all School grounds in De Parys Ave, sports fields including Gordon Fields, Ickwell conservation area, boarding houses and other properties owned or managed by the School.
- **Maintenance & Operation**
 - The system will be operational 24 hours a day, every day of the year.
 - The System Manager will check, or arrange for the checking, and confirm that the system is properly recording and that cameras are functioning correctly on a regular basis.
 - The system will be formally checked and to the extent necessary serviced no less than annually.
- **Storage of Data**
 - The day-to-day management of system data will be the responsibility of System Manager or such suitable person as the System Manager shall appoint in his or her absence.
 - System data will be stored for no more than 30 days and automatically over-written unless the 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 the School's own Data Protection Policy and Data Retention Policy.
 - 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 2).
- **Viewing of System Data**
 - The following staff shall have the right to view system data at any time: - the Head Master, the Vice Master, the Headmaster, the Director of Finance & Operations (DFO), Operations Director and the Designated Safeguarding Lead (Assistant Head Pastoral).
 - Other staff may be authorised to conduct routine viewing of system data on occasions where authorisation is provided by the Head Master, Vice Master, DFO and the Operations Director .
 - 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

- Individuals also have the right to access personal data the School holds on them (please see the School's Privacy Notice and Data Protection Policy), 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 – please see Appendix 1. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.
- The System 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, consulting the DFO as required. The following are examples when the System Manager 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 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;
 - To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out above;
 - To the 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 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).

• Other CCTV systems

The 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 the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to the System Manager or DFO in the first instance.

Appendix 1 – CCTV Data Access Request

The following information is required before the 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 the school typically deletes CCTV recordings after 1 month.

Name and address: (proof of ID may 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 CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 or over, the child'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 child.**

Appendix 2 – CCTV Viewing Log

Camera number	Date	Time	Viewed by	Date viewed image	Time of viewed image	Length of viewed image	Reason	Recorded Y/N with location	Crime number if applicable