



Heath Mount School

CCTV Policy

Heath Mount School, Hertfordshire

**Independent Day and Boarding School for Boys
and Girls**

September 2024

1. Introduction and Purpose

- 1.1 The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Heath Mount School ('the School'). It also serves as a notice and a guide to data subjects (including pupils, parents, staff, governors, 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').
- 1.2 The System is administered and managed by the 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. (For further guidance, please review the Information Commissioner's CCTV Code of Practice).
- 1.3 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.
- 1.4 A list of the location of the cameras can be obtained from the Bursar.
- 1.5 The School's purposes of using the System are set out below and, having fully considered the privacy rights of individuals, the School believes these purposes are all in its legitimate interest. Data captured for the purposes below will not be used for any commercial purpose.

2. Access and Accessibility

- 2.1 This policy applies to all those who enter the School site and whose image and vehicles may be captured by the system. These data subjects are listed in paragraph 1.1. This policy is available on the School's website and to all staff via the policies file on the staff drive and on the staff room noticeboards.

3. Objectives of the CCTV System

- 3.1 To protect pupils, staff, volunteers, governors, visitors and members of the public with regard to their personal safety.
- 3.2 To protect the school buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- 3.3 To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- 3.4 To monitor the security and integrity of the School site and deliveries and arrivals, including number plate recognition.
- 3.5 To monitor staff and contractors when carrying out work duties.
- 3.6 To monitor and uphold discipline among pupils in line with the School's rules and values as outlined in the School's Behaviour and Discipline and related policies.

4. Positioning

- 4.1 External locations have been selected that the School reasonably believes require monitoring to address the stated objectives. The School does not have any interior camera locations.
- 4.2 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.
- 4.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including staff accommodation, changing and washroom facilities, the swimming pool, boarding dormitories and the Medical Centre.
- 4.4 No images of public spaces will be captured except to a limited extent at site entrances.

5. Maintenance

- 5.1 The System will be operational 24 hours a day, every day of the year.
- 5.2 The School's Network Manager will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
- 5.3 The System will be checked and (to the extent necessary) serviced no less than annually.

6. Supervision of the System

- 6.1 Staff authorised by the School to conduct routine supervision of the System may include members of the Senior Management Team (SMT), the Network Manager, the Operations and Estates Manager, day or night security and relevant staff on duty. Images and footage are stored on school servers and are only accessible by approved School staff. Third parties do not have access to this data.
- 6.2 Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access by unauthorised persons. Moreover, footage can only be viewed on School devices.

7. Storage of Data

- 7.1 The day-to-day management of images will be the responsibility of the Network Manager, or such suitable person as the Network Manager shall appoint in his or her absence.
- 7.2 Images will be stored for 30 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. Images and footage will only be stored on school servers and are not saved to the cloud or any external servers.
- 7.3 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 and kept in a secure location by the Network Manager.

8. Access to Images

- 8.1 Access to stored CCTV images will only be given to those authorised persons listed in paragraph 6.1, above under the supervision of the Network Manager, in pursuance of the objectives in paragraph 3, above (or if there is some other overriding and lawful reason to grant such access).
- 8.2 Individuals also have the right to access personal data the School holds on them (please see the School's Data Protection Policy), including information held on the System, if it has been kept. If any individual wishes to exercise this right, they must do so in writing to the Bursar in her capacity as the School's Data Protection Lead. The School will require specific details relating 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 other individuals are identifiable. Please note, images are kept for no longer than 30 days and are automatically overwritten after this time. A CCTV access request form can be found at Appendix 1.
- 8.3 Upon receipt of a request, the Bursar will verify the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The Bursar will confirm this with the Network Manager. The following are examples of when the Network Manager may authorise access to CCTV images:
 - 8.3.1 Where required to do so by the Head, the Police or some relevant statutory authority;
 - 8.3.2 To make a report regarding suspected criminal behaviour;
 - 8.3.3 To enable the Designated Safeguarding Lead (DSL) or one of the Deputy DSLs to examine behaviour which may give rise to any reasonable safeguarding concern;
 - 8.3.4 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;
 - 8.3.5 To assist the School in establishing facts in cases of unacceptable behaviour of any member of staff or the school community, including those data subjects listed in paragraph 1.1, above.
 - 8.3.6 To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 7.2 above;
 - 8.3.7 To the School's insurance company where required in order to pursue a claim for damage to insured property; or
 - 8.3.8 In any other circumstances required under law or regulation.
- 8.4 Where images are disclosed under 7.2 above, a record will be made by the System Manager 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 or insurance claim number (if applicable).

9. Other CCTV systems

- 9.1 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/the rules and obligations set out in its contractual documents and policies.

- 9.2 Where pupils travel on coaches provided by third party contractors, these coaches may be equipped with CCTV systems. 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. The School may also record pupil behaviour within a CCTV system on the School minibuses.
- 9.3 An Automatic Number Plate recognition camera is used at the main gate to monitor the movement of traffic on and off site.
- 9.4 Although not a continuous method of recording and storing images, on occasion filming of pupils may take place in the Performing Arts Centre, the Chapel, the Music Room and any other performance area.

10. Complaints and queries

- 10.1 Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, or requests for access, should be referred to the Bursar. Please contact bursar@heathmount.org for any complaints or queries.

11. Policy review

- 11.1 This policy is reviewed every 3 years or on any significant change to the use of CCTV within the School.

Governors' Committee normally reviewing:	Buildings and Infrastructure Committee
Effective from:	September 2024
Date of next review:	September 2025
Person responsible for implementation and monitoring	The Bursar The Network Manager
Related policies and procedures	<ul style="list-style-type: none"> • Data Protection Policy • Privacy Notice for Parents • Privacy Notice for Staff • Child Protection and Safeguarding • Policy Behaviour and Discipline Policy • IT Acceptable Use Policy

Appendix 1

CCTV FOOTAGE 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 a 30-day period.

Please provide this completed form to the Data Protection Lead (DPL) or send by email to privacy@heathmount.org

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)	

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.**