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CCTV Policy

Purpose

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) System at Haute Vallée School. It also serves as a notice and a guide to data subjects (including pupils, parents, carers, 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. This policy will be subject to review from time to time, and should be read with reference to the School's Privacy Policy (accessible here [\[link\]](#)).

All fixed cameras are in plain sight on the School premises and the School does not routinely use CCTV for covert monitoring of classrooms or monitoring of private property outside the School grounds. A list of cameras and their locations can be found in Appendix A.

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.

1. Objectives of the System

- 1.1 To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 1.2 To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- 1.3 To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- 1.4 To monitor the security and integrity of the School site
- 1.5 To monitor deliveries and arrivals.
- 1.6 To monitor staff and contractors when carrying out work / duties.

2. Positioning

- 2.1 Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.
- 2.2 Adequate signage has been placed in prominent positions to inform pupils, staff, parents and the general public that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.
- 2.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- 2.4 No images of public spaces will be captured except to a limited extent at site entrances. This will be minimised as much as possible and public spaces will only be captured as a result of overlap with the school premises.



3. Maintenance

- 3.1 The CCTV System will be operational 24 hours a day, every day of the year.
- 3.2 The Network and site managers will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
- 3.3 The System will be checked and (to the extent necessary) serviced no less than annually.

4. Supervision of the System

- 4.1 Staff authorised by the School to conduct routine supervision of the System may include relevant staff. E.g Headteacher, Senior Leadership Team, Designated Safeguarding Lead, Network Manager.
- 4.2 Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood or opportunity for unauthorised personal access.

5. Storage of Data

- 5.1 The day-to-day management of images will be the responsibility of the Network Manager who will act as the System Manager, or such suitable person the System Manager shall appoint in their absence. This is likely to be the Headteacher.
- 5.2 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.
- 5.3 Where such data is retained, it will be retained in accordance with the Act and the Government of Jersey 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.

6. Access to Images

- 6.1 Access to stored CCTV images will only be given to authorised personnel, under the supervision of the Network Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
- 6.2 Individuals also have the right to access personal data the School holds on them (please see the Privacy 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 other individuals are identifiable.**
- 6.3 The Network Manager will carefully consider the legitimacy of any request from persons wishing to view stored images or access the system. The following are examples when the Network Manager may authorise access to CCTV images:
 - a. Where required to do so by the Headteacher or members of the Senior Leadership Team, the Police or some relevant statutory authority (E.g. Education Department);
 - b. To make a report regarding suspected criminal behaviour;
 - c. To enable any Designated Safeguarding Leads to examine behaviour which may give rise to any reasonable safeguarding concern;
 - d. To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/carers will be informed as part of the School's management of a particular incident;
 - e. To conform with a data subject (or their legal representatives) Subject Access Request (under the Act and on the basis set out in 6.2 above);
 - f. To the insurance company, managed by the Senior Officer within CYPES, where required in order to pursue a claim for damage done to insured property;



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g. In any other circumstances required under law or regulation.

6.4 Where images are disclosed under 6.3 above, a record will be made in the system log book which will include details of 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).

7. Other CCTV Systems

7.1 The School does not own or manage third party CCTV systems, but may be provided by third parties with images of incidents where this in line with the objectives of the School's own Behaviour policy or CCTV policy.

7.2 Many pupils travel to School on buses provided by third party contractors and a number of these buses are equipped with CCTV systems. The School may use these in establishing facts.

8. Complaints and queries

8.1 Any queries in relation to the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Head teacher.



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Appendix A

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|-----|------------------------------|-----|--------------------------------|------|----------------------|
| 1. | 3G Pitch Near L | 36. | Corridor C40 | 71. | Science West Side |
| 2. | 3G Pitch Near R | 37. | Corridor C7 | 72. | Science West Side 2 |
| 3. | 3G Pitch Far L | 38. | Corridor C9 | 73. | Science South Side |
| 4. | 3G Pitch Far R | 39. | MFL Stairs - Bottom | 74. | Science South Side 2 |
| 5. | 3G Pitch Entrance | 40. | MFL Stairs - Top | 75. | Science North Side |
| 6. | Field | 41. | Corridor C39 | 76. | Science Bike Park |
| 7. | Reception Desk | 42. | Corridor C37 | 77. | Carpark Rear Gate |
| 8. | Science Steps | 43. | Diamond Room | 78. | S8 Classroom |
| 9. | A10 Front (Computer Room) | 44. | Humanities Stairs - Bottom | 79. | Cluster Slope |
| 10. | A10 Rear (Computer Room) | 45. | Exterior Library/Mont a L'Abbe | 80. | Canteen 1 |
| 11. | A7 Front (Computer Room) | 46. | 3G Pitch Pathway | 81. | Canteen 2 |
| 12. | A7 Rear (Computer Room) | 47. | Mall North Steps | 82. | Canteen 3 |
| 13. | Pool Entrance | 48. | Bridge | 83. | Canteen 4 |
| 14. | Tennis Courts Zebra Crossing | 49. | Staff Room Corridor | 84. | Lower PE Corridor |
| 15. | Minibus Park | 50. | RTL Room Corridor | 85. | Lower Lift Lobby |
| 16. | Exterior Caretakers Office | 51. | Pool Pathway | 86. | Sports Hall Corridor |
| 17. | ICT Corridor | 52. | Mont a L'Abbe Entrance L | 87. | Gym Corridor |
| 18. | Entrance Roadway | 53. | Mont a L'Abbe Entrance R | 88. | Ground Lift Lobby |
| 19. | Mall North | 54. | Field Pathway | 89. | Entrance Pathway |
| 20. | Mall South | 55. | Mont a L'Abbe Parking | 90. | Rear ARC Pathway |
| 21. | Additional Resource Centre | 56. | Mont a L'Abbe Rear Entrance 1 | 91. | ARC Corridor |
| 22. | Conference Room | 57. | MAL Rear Entrance 2 | 92. | ARC Lobby |
| 23. | Mall Staircase | 58. | Mont a L'Abbe Rear Entrance 3 | 93. | T9 Computer Room |
| 24. | C42 Computer Room | 59. | Mont a L'Abbe Rear Entrance 4 | 94. | T2 Conservatory |
| 25. | C12 Classroom | 60. | Music Corridor | 95. | T1 Conservatory |
| 26. | Corridor C45 | 61. | Top of the Canteen Stairs | 96. | T3 Conservatory |
| 27. | Corridor C39 | 62. | Theatre 1 | 97. | Yr 7 WC F Corridor |
| 28. | Corridor C15 | 63. | Theatre 2 | 98. | WC F Corridor |
| 29. | Corridor C12 | 64. | Practice Room | 99. | Yr 7 WC M Corridor |
| 30. | Corridor C37 | 65. | RTL Room 2 | 100. | WC M Corridor |
| 31. | Corridor C10 | 66. | RTL Room | 101. | Bike Park 1 |
| 32. | Corridor C42 | 67. | Canteen Slope | 102. | Bike Park 2 |
| 33. | Humanities Stairs - Top | 68. | Science Entrance | 103. | T8 PSHE Classroom |
| 34. | Corridor C16 | 69. | Science East Side | 104. | Technology Corridor |
| 35. | Corridor C18 | 70. | Science East Side 2 | 105. | Theatre |



Appendix B

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.

This right is subject to **certain exemptions from access**, including in some circumstances where other individuals are identifiable.

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 3 weeks.

Name and address: (Proof of ID may be required)	
Description of footage (including description of clothing, activity e	
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.