

Hulme Hall Grammar School



CCTV Policy

Policy Control	
Report	CCTV Policy
Approval Body	Finance
Date Reviewed	December 2022
Review Schedule	Bi Annual
Next Review due	December 2024

This policy relates to all sections of Hulme Hall Grammar School, including the Pre-School.

About this Policy

The purpose of this policy is to regulate and clarify the management and operation of the Closed Circuit Television (CCTV) System at Hulme Hall Grammar 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. The School's Business Manager, IT Manager and Site Manager are responsible for overseeing the CCTV and associated governance.

All fixed cameras are clearly visible on the School premises and the School does not routinely use CCTV for covert monitoring or monitoring of private property outside of its grounds.

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 of the System

- To protect pupils, staff, volunteers, 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, 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.

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 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.

No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.

No images of public spaces will be captured except to a limited extent at site entrances.

Maintenance

The CCTV System will be operational 24 hours a day, every day of the year.

The Site Manager and IT Manager will check and confirm that the system is properly recording, and that cameras are functioning correctly, on a regular basis.

The system will be checked and (to the extent necessary) serviced no less than annually.

Supervision of the System

Only the Site Manager and IT Manager are allowed to view and download the footage in presence of, and in accordance with, a member of the Senior Leadership Team.

All sessions and requests are logged and monitored, and who has viewed what footage is also logged.

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.

Storage of Data

The day-to-day management of images will be the responsibility of the IT Manager and Site Manager.

Images will be stored for up to 30 days, and automatically over-written unless the School considers it reasonably necessary to retain for the pursuit of the objectives outlined above, or if lawfully required to by an appropriate third party such as the police or local authority.

Where such data is retained, it will be retained in accordance with the General Data Protection Regulations (GDPR) and the School's 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.

Access to Images

Access to stored CCTV images will only be given to authorised persons, under the supervision of the Site Manager or IT Manager in accordance with a member of the Senior Leadership Team, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

Individuals also have the right to access personal data the School holds on them, 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.

The Senior Leadership Team, IT Manager and the Site 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 they may authorise access to CCTV images:

- Where required to do so by the Headmaster, the Police or some relevant statutory authority
 - To make a report regarding suspected criminal behaviour
 - To enable the Designated Safeguarding Lead or her appointed deputy to examine behaviour which may reasonably give rise to any potential safeguarding concern
 - To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardians 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 GDPR
 - To the School's insurance company where required in order to pursue a claim for damage done to insured property
 - In any other circumstances required under law or regulation.
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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, if the footage has been just viewed or downloaded and a crime incident number (if applicable).

Where images are provided to third parties, wherever practicable, steps will be taken to obscure images of non-relevant individuals.

Other CCTV Systems

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 rules.

For example, many pupils travel to School on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The School may use these in establishing facts in cases of unacceptable pupil behaviour, in which case the parents/guardians will be informed as part of the School's management of a particular incident.

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 Business Manager.



Headmaster: Mr D Grierson BA, MA (Econ)
Hulme Hall Grammar School, Beech Avenue, Stockport, SK3 8HA
Phone: 0161 485 3524
Email: secretary@hulmehallschool.org
Hulme Hall Educational Trust (Registered Charity No: 525931)

www.hulmehallschool.org

