

## **CCTV policy**

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television Systems throughout The Ladies' College site. It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the College 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 Ladies' College, who act as the Data Controller. This policy will be subject to the College's Data Protection Policy and Privacy Notice (please see our website for more information).

All fixed cameras are in plain sight on the College premises and the College does not routinely use CCTV for covert monitoring or monitoring of private property outside the College grounds.

At present 19 exterior cameras are located and monitor at all entrances to the College and most routes through the site.

The College's purposes for using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the College 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 College 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 College site and deliveries and arrivals.
- 1.5 To use as a tool to review queries and concerns.

### **2. Positioning**

- 2.1 Locations have been selected, that the College reasonably believes require monitoring to address the stated objectives.

2.2 Adequate signage has been placed in prominent positions to inform adults and pupils that they are entering a monitored area.

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.

### **3. Maintenance**

3.1 The CCTV System will be operational 24 hours a day.

3.2 The System Manager (defined below) 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. Access to the System**

4.1 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.

### **5. Storage of Data**

5.1 The day-to-day management of images will be the responsibility of the IT Manager who will act as the System Manager, or such suitable person as the System Manager shall appoint in their absence – usually an IT Technician. The Premises Manager will have access for immediate security needs.

5.2 Images will be stored for 90 Days and automatically over-written unless the College 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 border agency.

5.3 Where such data is retained, it will be retained in accordance with the College's Data Protection Policy, Taking, Storing and Using Images of Children Policy, Retention of Records and Data Storage Policy and Privacy Notice. 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 CCTV Retention Register (see Appendix B). The CCTV Retention Register is kept by the System Manager and overseen by the Vice Principal.

### **6. Access to Images**

6.1 Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager or 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). Such access will be recorded in the CCTV Access Register (see appendix C) which is maintained by the System Manager and overseen by the Vice Principal.

6.2 Individuals also have the right to access personal data the College holds on them (please see the Data Protection policy and the Privacy Notice), including information held on the

System, if it has been kept. The College will require specific details including 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.

- 6.3 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. The following are examples of when the System Manager may authorise access to CCTV images:
- 6.3.1 Where required to do so by the Principal, Vice Principal, the Police or some relevant statutory authority;
  - 6.3.2 Following suspected criminal behaviour;
  - 6.3.3 To the College's insurance company where required in order to pursue a claim for damage done to insured property; or
  - 6.3.4 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 Subject Request Register (see Appendix D) which is maintained by the Systems Manager and overseen by the Vice Principal, including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed.

## **7. Other CCTV systems**

- 7.1 The College 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 College's own CCTV policy.

## **8. Data Export**

- 8.1 Data is exported to the Police when they compel the College to do so as part of a Police investigation, and they provide a receipt note which makes clear their responsibility for handling the data in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017. Unless advised otherwise, the College will inform those in the images sought.
- 8.2 Data exported internally to the College will be accompanied by a statement, either e-mail or in writing, that the recipient is responsible for managing the data in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017.

## **9. Complaints and Queries**

- 9.1 Any complaints or queries in relation to the College's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Vice Principal.

**APPENDIX A - CCTV FOOTAGE ACCESS REQUEST**

The following information is required before the College 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 College typically deletes CCTV recordings after 90 days.

**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** .....

\* Please note 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





