

CCTV POLICY

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CCTV POLICY

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Benenden School (Kent) Limited and its subsidiaries (the 'School' or 'Benenden'). 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. This policy will be subject to review from time to time and should be read with reference to the School's Data Protection Policy and Privacy Notice. For further guidance, please review the [Information Commissioner's CCTV Code of Practice](#)

All 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. The cameras' locations are listed at appendix 1.

1. OBJECTIVES OF THE SYSTEM

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.

- 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, and number plate recognition.
- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the School policies, which are available to parents and pupils on request.

2. 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.

3. MAINTENANCE

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

4. SUPERVISION OF THE SYSTEM

Staff authorised by the School to conduct routine supervision of the System may include the Estates and Office staff, security, and relevant staff on duty. 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.

5. STORAGE OF DATA

The day-to-day management of images will be the responsibility of Director of Estates and Grounds who will act as the System Manager, or such suitable person as the System Manager shall appoint in their absence. The IT department are responsible for ensuring the CCTV images are being recorded, stored and retained securely and in line with the stated retention period.

Images will be stored for 25 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. 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 logbook.

6. ACCESS TO IMAGES

Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, 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 (please see the School's Privacy Notice, Staff 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. 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. 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 their 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 logbook 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).

Where images are provided to third parties under 6.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

7. 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 School policies.

Pupils travel in vehicles provided by third party contractors and a number of these vehicles are 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 has an Automatic Number Plate Recognition (ANPR) system in operation at the entrance and exit gates which works in conjunction with the CCTV cameras to open the barriers for registered vehicles.

8. 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 Director of Finance and Operations.

For any other queries concerning the use of your personal data by the School, please see the School's applicable Privacy Notice.

August 2021

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 25 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

*** NB if requesting CCTV footage of a child under 12, a person with parental responsibility should sign this form. For children over that age, 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.**

CCTV POLICY – APPENDIX 1 CCTV LOCATIONS



Building	Internal / External	Location	Looking at
Entrance	External	Front Gate	Looking out towards the main road
Exit	External	Rear Gate	Looking out towards the main road
Road	External	Main Road Fork	Looking down the driveway towards oncoming cars
Road	External	Rear Road Fork	Looking down the driveway towards vehicles exiting
Hemsted	External	Hemsted Main Entrance	Looking over the Hemsted doorway
Hemsted	Internal	Hemsted Main Entrance	Looking at visitors and anyone using the main door
Hemsted	External	Hemsted Luggage Entrance	Looking over the Hemsted doorway
Hemsted	Internal	Hemsted Luggage Entrance	Looking at visitors, deliveries and anyone using the door
Norris	External	Norris	Towards Chapel, Hall, Rose Garden
SCN	External	SCN	Towards DT building
Founders	External	Founders	Looking out towards the back fields
Laundry	External	Laundry – Walled Garden Side	Looking at the ECO walkway and the open grass area
Laundry	External	Laundry – Weston Crescent	Towards the houses
Pavilion	External	Pavilion	Internal Entrance/Lower Entrance
Estates PTZ	External	Above the main entrance door to estates	View of road down to walled garden and also car park
New music exit by Chapel	Internal	New Music building	Looking back into Cloisters
Centenary Buildings	External	Rose Garden elevation doors on the rear of the building	Looking along the building from the main hall exit towards the main entrance
Centenary Buildings	External	Rose Garden under canopy	Looking out towards the sundial and main lawn
Centenary Buildings	Internal	First floor opposite lift	Looking back towards the lift doors
Centenary Buildings	Internal	Jat Atrium adjacent to music	Looking towards the foyer
Centenary Buildings	Internal	Ground floor corridor by comms room	Looking towards the comms room
Centenary Buildings	Internal	In the Anna Birkett Atrium - music foyer	General view of the whole of the foyer area.

CCTV POLICY – APPENDIX 1 CCTV LOCATIONS



Centenary Buildings	External	Plant room approach -on the external wall above the well that leads to the plant room	Looking down towards the car park and the entrance road to the pavilion.
Centenary Buildings	External	On the rear of the building	Looking towards the pavilion.
Centenary Buildings	Internal	Within the music foyer	General view of the pavilion
Centenary Buildings	External	Music rear steps to courtyard - above the rear fire exit doors	Looking down onto the steps and the seniors courtyard.
Centenary Buildings	Internal	Cloisters entrance approach - on the wall above the cloisters approach	Looking towards people entering the building through cloisters.
Centenary Buildings	Internal	First floor above music foyer	General view of the music foyer
Centenary Buildings	External	Rose garden view from Music - on the rear wall of music	Looking towards the rose garden general view.
Centenary Buildings	Internal	Main foyer towards courtyard - above Gibbs bar	General view of the whole foyer
Centenary Buildings	External	Courtyard towards main entrance - on the rear of the building in Seniors Courtyard	Looking at the main entrance doors into the new building from the courtyard.
Centenary Buildings	Internal	First floor on the wall	Looking at the main lift doors