

Collège Français Bilingue de Londres
("CFBL" or the "School")

Authorised by:	The Board of Governors of CFBL
Last review date:	WR 6 December 2023
Next review:	Nov 2026 (at least every 3 years) and/or following any updates to national and local guidance and procedures
Circulation:	Governors/all staff/volunteers: automatically Parents: on request + School Website Staff: Staff shared drive > Policies

CCTV Policy

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at CFBL (the "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 owned and operated by the School.

The System is administered and managed by the School, who acts 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 Notice. For further guidance, please review the Information Commissioner's CCTV Code of Practice.

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.

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. CCTV cameras are not used as a substitute to pupils' supervision by School staff or staff supervision by school management.

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 and deliveries and arrivals.
- 1.5 To support investigations conducted by the School following an incident (or allegations of an incident) or accident involving pupils or staff.
- 1.6 To monitor how staff and contractors performed their duties in the context of an accident or an incident and uphold sanctions if need be.
- 1.7 To monitor and uphold discipline among pupils in line with the School Rules (*Règlement Intérieur*) which are available to parents and pupils on request and available on the website.

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 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.

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.

2.5 At no time will a camera be directed to follow or track an individual as all the currently deployed cameras are fixed.

2.6 Although the placing of cameras is designed to ensure maximum effectiveness, it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

3. Maintenance

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

3.2 The CCTV system is administered and managed by the Head of Finance and Administration. The day-to-day management will be the delegated responsibility of the Premises Manager. He 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. Live monitoring

4.1 Main access cameras are monitored from the Reception area; all cameras are accessible from any computer within the local domain using credentials given by the system administrator. Staff authorised by the School to conduct routine supervision of the System may include all relevant staff on duty. Out of school hours, the Reception monitoring station is locked when not manned. 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

5.1 The day-to-day management of images will be the responsibility of the Premises Manager who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.

5.2 Images will be stored for not more than one month and automatically over-written unless the School considers it reasonably necessary to retain the images for longer 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 Data Protection Act and our 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 system log book.

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, 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 School's Privacy Notice), 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. Please note that for safeguarding purposes, the School will usually not allow access to CCTV images to a person exercising her right of access (or their legal representatives) when other individual(s) are identifiable on the images, except as provided under 6.3 below.

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 when the System Manager may authorise access to CCTV images:

- 6.3.1 Where required to do so by the Head, the Police or some relevant statutory authority;
- 6.3.2 To make a report regarding suspected criminal behaviour;
- 6.3.3 To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- 6.3.4 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;
- 6.3.5 To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 6.2 above;
- 6.3.6 To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
- 6.3.7 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 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).

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

6.6 In the event that copies of images are made, the recordings made will be properly indexed, stored and destroyed after appropriate use. Copies of images may only be viewed by authorised individuals and the Police.

7. Complaints and queries

7.1 Any complaints or queries in relation to the School's CCTV system or its use of CCTV should be referred to the Headteacher or the Head of Finance and Administration. For any other queries concerning the use of your personal data by the School, please see the School's applicable Privacy Notice.

Last reviewed by management and safeguarding trustee: November 2023

CCTV FOOTAGE ACCESS REQUEST FORM

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 1 month period.

Name and address: (proof of ID will 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.**