

# Cayman Prep and High School



## Closed Circuit Television (CCTV) Policy

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## WHOLE SCHOOL

### School Mission Statement:

***At Cayman Prep and High School, we aim to provide a stimulating learning environment, firmly rooted in Christian principles, in which our students become critical creative thinkers, responsible citizens and lifelong learners in an ever-changing world".***

### Core Values:

<b><i>Loyalty</i></b>	<b><i>Forgiveness</i></b>
<b><i>Self-Discipline</i></b>	<b><i>Empathy</i></b>
<b><i>Integrity</i></b>	<b><i>Friendship</i></b>
<b><i>Excellence</i></b>	<b><i>Caring</i></b>
<b><i>Respect</i></b>	<b><i>Communication</i></b>

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## **This Policy**

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) System at Cayman Prep and High School (the **school**). It also serves as a notice and a guide to data subjects (including students, 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.

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. A list of the cameras with identifying numbers installed at each site are listed in Appendix 2

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 students, 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 students, 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 protect staff and contractors when carrying out work duties.
- 1.6 To monitor and uphold discipline among students in line with the School Rules, which are available to parents and students.

## **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 students 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 bathroom facilities.
- 2.4 No images of public spaces will be captured except to a limited extent at site entrances.

## **3. Monitoring & Maintenance**

- 3.1 The CCTV System will be operational 24 hours a day, every day of the year.
- 3.2 The System Manager, or such suitable person as the System Manager shall appoint in his or her absence, will check and confirm that the system is properly recording and that cameras are functioning correctly, on a weekly basis. The weekly check will be logged detailing the condition of each individual camera. Any cameras not functioning will be reported to the Business Manager immediately for repairs to authorised.

## **4. Supervision of the System**

- 4.1 Staff authorised by the School to conduct routine supervision of the System are agreed by the SLT and will be periodically reviewed.
- 4.2 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 System Manager, or such suitable person as the System Manager shall appoint in his or her absence.

- 5.1 Images will be stored for no longer than 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.
- 5.2 Where such data is retained, it will be retained in accordance with the Act and the CPHS 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**

- 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 to them (please see the Data Protection Policy), including information held on the System, if it has been kept. The school will require specific details including:
- The identity of the camera (Appendix 2) and the footage
  - The date and time of the footage
  - The reason to disclose
  - Authorised Staff present when the files are being accessed.
  - Details of any copies requested.
  - Authorisation from SLT for access to the footage and approval for copies to be made.

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 when the System Manager may authorise access to CCTV images:
- 6.3.1 Where required to do so by the Senior Leadership Team, the Police (RCIPS) 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/Child Protection Officer 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 student 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 the School's insurance company where required to pursue a claim for damage done to insured property; or
- 6.3.6 In any other circumstances required under law or regulation

6.3.7 Access through designated school devices is currently available to the following CPHS Staff

Director  
Business Manager  
HS Principal  
Head of Pastoral Care & Student Services  
Head of Key Stage 4  
Head of Year 12 & 13  
PS Principal  
PS Deputy Principal  
Facilities Manager

- 6.4 Where images are disclosed under 6.3 above 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).
- 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. The CCTV Footage Access Request included in Appendix 1 must be completed prior to access being provided.
- 6.6 The Facilities Manager has authorised remote access to the CCTV system at all times via their mobile phone. The access is to enable the site to be monitored in case of an emergency and to ensure that staff entering the site after the site has been secured are safe.

## **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 CCTV policy and/or its School Rules.

## **8. Complaints and queries**

- 8.1 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: [businessmanager@cayprep.edu.ky](mailto:businessmanager@cayprep.edu.ky).

## APPENDIX 1

### 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 30 days.

Name and address or Authority seeking information:  (proof of ID may be required)	
Reason and 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 .....

## Appendix 2

### LOCATIONS AND NUMBERS OF CAMERAS

#### Primary School

PS-Network Video Recorder (NVR)-01 PS  
Junior Block

PS01 - Front Parking Lot

PS02 - Junior Field

PS03 - Junior Block Road Exit

PS04 - Fire Lane

PS-NVR-02 PS Canteen (KG)

PS05 - Year 1 & 2 Back Doors

PS06 - Behind Canteen

PS07 - Music Passage

PS-NVR-03 PS Canteen 2

PS08 - KG Field

PS09 - Front Parking Lot Entrance

PS10 – Gazebo

PS11 - School Main Entrance

PS12 - KG Entrance

PS-NVR-04 PS 2 Story building

PS13 - KG Entrance

PS14 – Rear Gate

PS15 - Rear Path

PS16 - Year 1 Entrance

PS17 - 2 Story Entrance

PS18 - 2S Covered Walkway

PS19 – Field

#### High School

HS-NVR-01 HS Admin

HS01 – Reception

HS02 - MFL Side Entrance

HS03 - MFL Hallway

HS04 - Art room Entrance

HS05 - Humanities Side Entrance

HS06 - Humanities Hallway

HS07 - Student Locker

HS08 - Upstairs Corridor

HS09 - Staff Parking East

HS10 - Staff Parking West

HS-NVR-02 HS Server Room

HS11 - 3 Story Entrance Hallway

HS12 - Library Hallway

HS13 - Science Hallway

HS14 - English/Math Hallway

HS15 - Main Field

HS16 - Basketball Court

HS-NVR-03 HS Facilities/6th Form

HS17 - Canteen Back Entrance



HS18 - Canteen Front Entrance  
HS19 - Canteen to Hall Entrance  
HS20 - Behind 6th Form  
HS21 - 70s Hallway