



Reference number		Policy name	CCTV Policy and Procedure
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Person(s) responsible	Will Forse	Date of next review	January 2025
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Vision, mission and values	<p>Mission To produce well-rounded, academically successful, happy young men and women.</p> <p>Vision To engage, inspire and extend our students, our staff and the wider community.</p> <p>Values To create a community where everyone mirrors our values of good manners, kindness and wisdom.</p>
Purpose	<p>The purpose of this CCTV Policy and Procedure is to establish clear guidelines for the installation, operation, and management of closed-circuit television (CCTV) systems within our international school. This policy aims to:</p> <p>Enhance Safety and Security: Provide a safe and secure environment for students, staff, and visitors by deterring and preventing unauthorized access, vandalism, and other criminal activities on school premises.</p> <p>Protect Individuals and Property: Safeguard the well-being of all individuals within the school community and protect school property from damage and theft, ensuring a secure learning and working environment.</p> <p>Ensure Compliance with Laws and Regulations: Align with applicable local, national, and international laws and regulations regarding the use of surveillance systems, ensuring that all CCTV operations respect privacy rights and legal standards.</p> <p>Promote Transparency and Accountability: Foster transparency in the use of CCTV by clearly communicating the purpose, scope, and procedures related to surveillance to all stakeholders, including students, parents, staff, and visitors.</p> <p>Preserve Privacy and Confidentiality: Balance the need for surveillance with the right to privacy by ensuring that CCTV systems are used responsibly and that data collected is handled securely and confidentially, with access restricted to authorized personnel only.</p> <p>Support Incident Response and Investigation: Provide a reliable means of recording and reviewing incidents to support effective response, investigation, and resolution, thereby enhancing the overall safety and security management within the school.</p> <p>Facilitate Continuous Improvement: Establish a framework for regular review and assessment of CCTV practices to ensure they remain effective, up-to-date, and in</p>



	alignment with the evolving needs of the school community and advancements in technology.
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Approved by	SLT	Date	29/10/2023
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CCTV Policy and Procedure

I Background

I.1 King's College International School Bangkok (the "School" or "King's Bangkok") uses closed circuit television (CCTV) images for;

1. the identification, reduction and prevention of crime
2. the monitoring of the school buildings in order to provide a safe and secure environment for students, staff and visitors
3. the prevention of loss or damage to school property and the property of others
4. identifying individuals involved in incidents that breach the school's codes of conduct

I.2 CCTV surveillance at the School is intended for the purposes of:

- protecting the school buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, students and visitors;
- preventing bullying;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the police and the King's Bangkok's security team in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and ensuring that the school rules are respected so that the school can be properly managed.

I.3 The system comprises 311 fixed cameras.

I.4 The CCTV system is owned and operated by the security guard team and the deployment of which is determined by the school's leadership team. The team is trained in this policy and procedure.

I.5 The CCTV is monitored centrally from the Security room by the main reception.



1.6. This policy outlines the school's use of CCTV and how it complies with the Personal Data Protection Act B.E. 2562.

1.7 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained in their responsibilities. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

1.8 The school ensures CCTVs are used responsibly and safeguards both trust and confidence in its continued use.

1.9 The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy eg, CCTV will not be used for monitoring employee performance.

1.10 CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school.

2 Justification for use of CCTV

2.1 The use of CCTV to monitor the perimeter of the school buildings for security purposes. The system is intended to capture images of intruders or students leaving the premises without authorisation, and individuals damaging property or removing goods without authorisation or of anti-social behaviour.

2.2 The use of CCTV to keep students, visitors and staff safe.

2.2 CCTV systems will not be used to monitor normal teacher/student classroom activity in school.

3 Data Protection Impact Assessments

The Vice Chair of Executive Committee will carry out a Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This may involve the need for consultation with staff and parents.

4 Location of Cameras



4.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated.

4.2 The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Personal Data Protection Act B.E. 2562 (2019). The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

4.3 CCTV cameras will not be used in classrooms.

4.4 CCTV will not monitor areas where individuals would have a reasonable expectation of privacy. King's has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.

4.5 Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

4.6 CCTV Video Monitoring and Recording of Public Areas may include the following:

- Protection of school buildings and property: the building's perimeter fence and roads, entrances and exits, lobbies and corridors, special storage areas, office locations, receiving areas for goods/services
- Monitoring of Access Control Systems: monitor and record restricted access areas at entrances to buildings and other areas
- Verification of Security Alarms: intrusion alarms, exit door controls, external alarms
- Criminal Investigations (carried out by police): robbery, burglary, theft surveillance and child protection.

5 Covert Surveillance

King's Bangkok will not engage in covert surveillance.

6 Notification

A copy of this CCTV Policy will be provided on request to staff, students, parents and visitors to the school.

7 Storage and Retention



7.1 The images and recordings captured by the CCTV system will be retained for a maximum of 28 days, unless the CCTV images/recordings capture issues (such as criminal behaviour or a risk to health and safety) and the CCTV images/recordings are retained to investigate that issue.

7.2 The images/recordings will be stored in a secure environment with a log of access kept.

8 Access

8.1 Recorded footage and the monitoring equipment will be securely stored in the security office. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel. A log of access to footage will be maintained.

8.2 Access to the CCTV system and stored images will be restricted to authorised personnel only. Supervising the access and maintenance of the CCTV System is the responsibility of the Executive Principal. The Headmaster may delegate the administration of the CCTV System to another staff member.

8.3 When accessing images two authorised members of staff must be present. A written record of access will be made. Records of access will be kept. (Appendix I). It is best practice if a recording shows an activity of an intimate or sexually explicit nature, that the Headmaster firstly determines who should see this footage so as to minimise the risk of an accusation being made against a member of staff of viewing indecent sexual/child pornography images.

8.4 A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

8.5 Data may be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject may be offered the opportunity to view the footage.

8.6 In relevant circumstances, CCTV footage may be accessed:

- by the police where the School are required by law to make a report regarding the commission of a suspected crime;
- following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on school property or its perimeter road;



- to the DSL and/or any other statutory body charged with child safeguarding;
- to assist the Headmaster in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed;
- to data subjects (or their legal representatives), pursuant to a Subject Access Request;
- to individuals (or their legal representatives) subject to a court order;
- to the school insurance company where the insurance company requires the same in order to pursue a claim for damage done to the insured property.

9 Subject Access Requests (SAR)

9.1 Individuals have the right to request access to CCTV footage relating to themselves under the Personal Data Protection Act.

9.2 Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

9.3 The school will respond to requests within 30 calendar days of receiving the request in line with the school's right of access policy.

9.4 The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

9.5 A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it, will be made.

9.6 In giving a person a copy of their data, the school provides a still or series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

9.7 Where footage contains images relating to the third parties, the school will take appropriate steps to mask and protect the identities of those individuals.

10 Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headmaster in the first instance.

11 Staff Training

11.1 Staff authorised to access the CCTV system will be trained to comply with this policy. Staff will



understand that all information relating to the CCTV images must be handled securely and is strictly confidential.

11.2 Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.

11.3 Staff misuse of surveillance system information will lead to disciplinary proceedings.

12 Responsibilities

The Headmaster (or nominated person) will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by King's Bangkok;
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within King's Bangkok;
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy;
- Ensure that the CCTV monitoring at King's Bangkok is consistent with the highest standards and protections;
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy;
- Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system;
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally;
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment;
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place;
- Co-operate with the Estates manager of King's Bangkok in reporting on the CCTV system in operation in the school;
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy";
- Ensure that monitoring footage are stored in a secure place with access by authorised personnel only;
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not



longer than 28 days and are then erased unless required as part of an investigation or court proceedings (criminal or civil);

- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy;
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics;
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.

All policies are reviewed regularly and are subject to change.

Appendix I

CCTV Monitoring log

Anyone looking at CCTV recordings must have a second person with them and must complete this form.

Date	Time	Name	Name	Reason/ Incident



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