



CCTV Policy

September 2025

Governor Responsibility	Premises Committee
Policy Owner	Bursar/Operations Manager
Review Cycle	Annually
Policy Date and Version	September 2025
Next Review Date	September 2026

1. Introduction

This policy applies to all staff, governors, contractors, pupils, and visitors to the school site.

The school recognises that CCTV can affect privacy and has conducted a Data Protection Impact Assessment (DPIA), confirming that CCTV is a necessary and proportionate way of meeting the objectives set out below.

The CCTV system forms part of the school's safeguarding arrangements and complements other measures in place to ensure the welfare and protection of pupils. Its use supports compliance with the Independent School Standards (ISS), particularly: Its use also supports compliance with statutory safeguarding guidance, including *Keeping Children Safe in Education*

(KCSIE):

- Part 3 – Welfare, health and safety of pupils
- Part 8 – Quality of leadership and management.

This policy is reviewed at least annually, or sooner if required

2. Objectives of CCTV

The objectives of CCTV are:

Safety

- Protect pupils, staff, and visitors from harm.
- Increase personal safety and reduce fear of crime.
- Establish the cause of accidents or incidents and help prevent recurrence.

Security

- Protect school buildings and assets.
- Support the police in preventing and detecting crime.
- Help identify and prosecute offenders.

Management

- Support effective day-to-day school management.
- Deter and help manage bullying, vandalism, and poor behaviour.

3. Scope

- Cameras are only placed in areas where individuals do not reasonably expect privacy. They are never installed in toilets, changing rooms, or other sensitive areas.
- All CCTV cameras are clearly signed.
- The full Camera Register is included as Appendix A.
- Temporary or covert surveillance will only be used where authorised under the Regulation of Investigatory Powers Act (RIPA) and never for routine monitoring of pupils or staff.
- CCTV coverage is risk assessed as part of the school's wider safeguarding, health and safety, and security risk assessments.

- **4. Statement of Intent**

The CCTV system complies with:

- Data Protection Act 2018 and UK GDPR
- Surveillance Camera Code of Practice (Home Office, 2021)
- Information Commissioner's Office (ICO) guidance
- Human Rights Act 1998 (right to privacy, proportionality)
- The Independent School Standards (ISS) requirement to safeguard and promote pupil welfare
- Equality Act 2010 – ensuring CCTV use does not discriminate against individuals or groups.

Principles

- CCTV images are personal data.
- Cameras are positioned to minimise intrusion into private areas.
- Data will never be used commercially or for entertainment.
- Footage is only shared with the police or other authorised agencies (e.g., insurers, legal advisors) when properly authorised.
- Wireless signals are encrypted to ensure security.
- Staff with authorised access will receive training on data protection, safeguarding, and system use (refresher at least every 2 years).
- New staff with authorised access to CCTV receive training as part of their induction.

5. Data Retention

- Footage is automatically overwritten and deleted after 21 days
- Where footage is needed for investigation, disciplinary, insurance, or legal purposes, it may be retained for up to 6 months, or longer if required by legal process.
- Retention will be reviewed regularly.
- Secure deletion is verified by system checks.

In all cases, footage will not be retained for longer than is necessary, and never beyond the period required for the stated purpose.

6. System Management

- Data Controller: Governing Body (delegated to the Headteacher).
- System Manager: Operations Manager (or Bursar in their absence, with the Network Manager).
- Access is password-protected, encrypted, and strictly limited to authorised staff.
- All access is logged, recording who accessed the system, when, and why.
- Regular checks confirm cameras and recorders are functioning correctly.
- Cameras will not target individuals or private property without RIPA authorisation.
- An annual audit of the CCTV system will be undertaken to confirm compliance.
- A CCTV compliance report will be presented annually to governors as part of safeguarding
- CCTV compliance forms part of the school's wider safeguarding and data protection audits, providing assurance to governors.
- CCTV operation is monitored through the school's safeguarding and data protection framework.
- The Data Protection Officer (DPO) will be consulted at least annually on CCTV use.

7. Downloading and Evidential Use

- Each download is given a unique reference and logged.
- Copies are only made with written authorisation from the Headteacher or Bursar.
- Devices are encrypted and password protected.
- Media is securely cleared before reuse.
- Evidential copies are sealed, signed, dated, witnessed, and securely stored.
- All viewings, releases, and police handovers are recorded.
- All images remain the property of the school

8. Complaints

Complaints about the operation of CCTV should be made to the Bursar.

If unresolved, complaints may be escalated to the Headteacher or the Chair of Governors.

Complaints will also be handled in line with the school's:

[Complaints Policy](#)

[Safeguarding Policy](#)

[Data Protection Policy](#)

9. Subject Access Requests

- Individuals may request access to their personal data, including CCTV images, by writing to the Bursar.
- Proof of identity will be required before any data is released.
- The Bursar will consult the Data Protection Officer (DPO) before responding.
- Where footage contains third-party individuals, their images may be redacted or obscured before release.
- Requests will be managed in accordance with the school's Data Protection Policy.

10. Public Information

- Clear signs are displayed across the site to notify individuals that CCTV is in operation.
- This policy is available on the school website and on request from the school office.
- Parents and pupils are reminded annually, through induction materials and handbooks, that CCTV operates for safeguarding and security purposes.

Appendix A – Camera Register

The school maintains a Camera Register recording camera reference, location, type, sound capability, and recording status. Sound recording is disabled unless a specific, exceptional safeguarding or security need is identified and justified within the DPIA.

Ref	Location	Type (S=Swivel / F=Fixed)	Sound	Records
D1	Main Entrance	F	Y	Y
D2	The White Building	F	Y	Y
D3	Rear Field	F	Y	Y
D4	Main Entrance Car Park	S (PTZ)	Y	Y
D5	Reception Entrance	F	Y	Y
D6	MUGA (fixed position)	S (PTZ)	Y	Y
D7	Rear Drive	F	Y	Y
D8	Second Floor Landing	F	Y	Y
D9	Rear Entrance	F	Y	Y
D10	Side Entrance	F	Y	Y
D11	Facing Junior School	S (PTZ)	Y	Y
D12	Facing Gym Door	F	Y	Y
D13	Rear Field (Play Equipment)	F	Y	Y
D14	DT Foyer	F	Y	Y
D15	Back Landing – Top of Stairs	F	Y	Y
D16	Middle Landing (ICTB)	F	Y	Y
D17	Main Staircase – Top	F	Y	Y
D18	Minibus Parking (Junior End)	F	Y	Y
D19	Back of Junior School	F	Y	Y
D20	Bell Porch Entrance	F	Y	Y
D21	Reception	F	Y	Y

D22	MUGA 2		F		Y	Y
D23	Sports Field		F		Y	Y
D24	RHS	of	F		Y	Y
	Lockers					
D25	LHS	of	F		Y	Y
	Lockers					