

## **CCTV and Surveillance Systems Policy - General**

<b>Member of Staff Responsible</b>	<b>Bursar</b>
<b>Date of Policy</b>	<b>June 2026</b>
<b>Date for review</b>	<b>August 2029</b>
<b>Approved By Governors</b>	<b>N/A</b>
<b>Distribution:</b>	<b>All Staff</b>

### **I. Purpose and Scope**

We use CCTV cameras to view and record individuals on and around the School site (School site includes the School premises and grounds at George, Road, Rokeby Sports Grounds and minibuses and coaches used for school transport whether owned by the school or hired) in order to maintain a safe environment for pupils, staff and visitors, and to protect school property. This policy relates to the use and management of CCTV throughout the school premises.

We recognise that the images of individuals recorded by CCTV cameras are personal data which must be processed in accordance with data protection laws.

The purpose of this policy is to:

- outline why and how we will use CCTV, and how we will process data recorded by CCTV cameras;
- ensure that the legal rights of individuals, relating to their personal data, are recognised and respected;
- explain how to make a subject access request in respect of personal data created by CCTV.

We take compliance with this policy very seriously. Failure to comply puts at risk the individual's whose information is being processed, carries the risk of significant civil and criminal sanctions for the individual and for us, and may, in some circumstances, amount to a criminal offence by the individual. As a result, breach of this policy may be treated as a disciplinary matter and, following investigation, may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

The CCTV system is administered and managed by the School, which is the controller in respect of personal data collected by our CCTV cameras. If you have any questions about this policy, please contact the Bursar.

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. We will also review the ongoing use of existing CCTV cameras regularly to ensure that their use remains necessary and appropriate, and that the system is continuing to address the needs that justified its introduction.

## 2. Reasons for the use of CCTV

The School's purposes for 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, parents, staff and visitors with regard to their personal safety and to act as a deterrent against crime.
- To protect the School buildings and equipment, and the personal property of pupils, parents, staff and visitors from damage, disruption, vandalism and other crime.
- To prevent and detect crime, and support law enforcement bodies in the prevention, detection and prosecution of crime as well as the identification and apprehension of offenders.
- To monitor the security and integrity of the School site and deliveries and arrivals, including car parking 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's rules, which are available to parents and pupils on request.
- To assist in day-to-day management, including ensuring the health and safety of pupils, parents, staff and visitors.
- To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
- To assist in civil litigation, including employment tribunal proceedings.

Please note that this list is not exhaustive and other purposes may become relevant from time to time.

The CCTV system will not be used to:

- record sound except
  - a) on school transport to help safeguard the well-being of the pupils and staff
  - b) unless in accordance with the policy on covert recording (see below)
- for any automated decision taking; or
- monitoring private and/or residential areas or premises.

Before installing and using CCTV systems on our premises, we have:

- assessed and documented the appropriateness of and reasons for using CCTV;
- established and documented who is responsible for day-to-day compliance with this policy; and
- ensured signage is displayed to inform individuals that CCTV is in operation, and that CCTV operations are covered in appropriate policies.

We keep a record of the CCTV installed and used.

Once installed, reviews will be regularly undertaken to ensure that the use of CCTV systems and the processing of personal data obtained through it remains justified.

## 3. Monitoring

Locations for the CCTV cameras have been selected, both inside and outside our premises, that the School reasonably believes require monitoring to address the above objectives.

Adequate signage has been placed in prominent positions around the premises to inform pupils, parents, staff and visitors that they are entering a monitored area, identifying the School as the

controller operating the CCTV system and including contact details for further information regarding the CCTV system.

These locations have been chosen to minimise viewing of spaces not relevant to the legitimate purposes of the School's monitoring. As far as practically possible, CCTV cameras will not focus on private property; and no images of public spaces will be captured except to a limited extent at site entrances. In addition, surveillance systems will not be used to record sound except on school transport to help safeguard the wellbeing of pupils and no images will be captured from areas in which individuals would have a heightened expectation of privacy, including medical, changing and washroom facilities.

CCTV monitors the areas listed below. It is operational 24 hours a day and this data is continuously recorded apart from the minibuses and coaches where it is operational whilst in use only and this data is recorded.

Camera locations are chosen to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring. As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property.

#### ***Main School Site – George Road***

1. Front Entrance & Barrier
2. Hall Gate
3. Kitchen Gate
4. Kitchen Path
5. Exit Drive & Barrier
6. Front Drive look towards Hall
7. Front Drive looking towards Kitchen

#### ***Rokeby Sports Grounds***

1. Post, entrance gate
2. Post, main carpark
3. Pavilion, small carpark
4. Pavilion front entrance
5. Pavilion, back
6. Pavilion, tree line left
7. Pavilion front grounds
8. Maintenance shed, towards pavilion

#### ***School Coach***

1. Front
2. Rear
3. Left Hand side
4. Right Hand Side
5. Inside front looking back
6. Inside rear looking front
7. Inside looking at front door entrance
8. Middle looking at side door

#### ***School Minibuses***

1. Front

2. Rear
3. Inside front looking back

Surveillance systems are used to record sound on the school transport. This is to help safeguard the well-being of the pupils and staff.

#### **4. Supervision**

We will ensure that recorded images are only viewed by approved members of staff whose roles require them to have access to such data. This may include the Bursar, premises staff, HR and safeguarding / pastoral staff. Staff using the CCTV system will be given appropriate training to ensure that they understand and observe the legal requirements related to the processing of relevant data<sup>1</sup>. Images will only 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. Data and Image Retention**

Images and recording logs must be retained and disposed of in accordance with the Data Protection Policy And our Storage and Retention Policy. Images stored on removable media will similarly be erased or destroyed once the purpose of the recording is no longer relevant. Data will only be retained for legal and/or compliance reasons in accordance with the relevant Data Protection Policy and Storage and Retention Policy.

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the data, where it is possible to do so.

Given the large amount of data generated by surveillance systems, we may store video footage using a cloud computing system. We will take all reasonable steps to ensure that any cloud service provider maintains the security of our information, in accordance with industry standards.

We may engage data processors to process data on our behalf. We will ensure reasonable contractual safeguards are in place to protect the security and integrity of the data.

#### **6. Retention and erasure of data gathered by CCTV**

Exactly how long images will be retained for will vary according to the purpose for which they are being recorded. For example, where images have been authorised to be used for any disciplinary purpose or other legal reason, the footage must be retained securely in the relevant case file. The retention period for this file is set out in the School's Data Protection Policy and Storage and Retention Policy.

At the end of their useful life, all images stored in whatever format will be erased permanently and securely. Any physical matter such as tapes, discs, still photographs and/or hard copy prints will be disposed of as confidential waste. We will maintain a log of when data is deleted.

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<sup>1</sup> Training should cover: (a) what the School's policies are for recording and retaining CCTV footage; (b) how to handle CCTV footage securely; and (c) what to do if they receive a request for information (eg from the police) or a subject access request (eg from a pupil). THIS FOOTNOTE SHOULD BE REMOVED WHEN ISSUING THE POLICY.

## **7. Use of additional surveillance systems**

Prior to introducing any new surveillance system, including placing a new CCTV camera in any workplace location, we will carefully consider if they are appropriate and may carry out a data privacy impact assessment (**DPIA**).

A DPIA is intended to assist us in deciding whether new surveillance cameras are necessary and proportionate in the circumstances and whether they should be used at all or whether any limitations should be placed on their use.

Any DPIA will consider the nature of the problem that we are seeking to address at that time and whether the surveillance camera is likely to be an effective solution, or whether a better solution exists. In particular, we will consider the effect a surveillance camera will have on individuals and therefore whether its use is a proportionate response to the problem identified.

The School will confine CCTV to areas where expectations of privacy are low. No surveillance cameras will be placed in areas where there is an increased expectation of privacy (for example, in changing rooms or toilets) unless, in very exceptional circumstances, it is judged by us to be necessary to deal with very serious concerns. In this situation we will always complete a DPIA and have regard to it before deciding whether to proceed.

## **8. Covert monitoring**

Covert monitoring means monitoring carried out in a manner calculated to ensure those subject to it are unaware that it is taking place.

We will never engage in covert monitoring or surveillance unless, in very limited and highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or serious malpractice is taking place within the workplace and, after suitable consideration (including the completion of a DPIA), we reasonably believe there is no less intrusive way to tackle the issue. If necessary, we will only undertake covert recording in accordance with the Data Protection Laws and ICO guidelines.

In the unlikely event that covert monitoring is considered to be justified, it will only be carried out with the express authorisation of the Bursar or another member of the Senior Leadership Team following receipt of advice from the Data Protection Co-ordinator. The decision to carry out covert monitoring will be fully documented and will set out how the decision to use covert means was reached and by whom. The risk of intrusion on innocent workers will always be a primary consideration in reaching any such decision. The Data Protection Co-ordinator will have regard to the completed DPIA when making their decision.

Only limited numbers of people will be involved in any covert monitoring as necessary.

Covert monitoring will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected illegal or unauthorised activity. Its use should be immediately stopped when that specific investigation has been completed. Any decision to use covert surveillance for any reason must be fully documented and records of such decision retained securely.

## **9. Requests for disclosure**

Individuals have the right to request access to personal data that the School holds about them (otherwise known as a “subject access request”, on which please see the School’s Privacy Notice and Data Protection Policy for further information), including information collected by the CCTV system, if it has been retained.

In order to respond to a subject access request, the School will require specific details including (as a minimum) 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.

The School must also be satisfied as to the identity of the person wishing to view stored images and the legitimacy of their request.

No images from our CCTV cameras will be disclosed to a third party without express permission being given by the School. The following are examples of circumstances in which the School may authorise disclosure of CCTV images to third parties:

- Where required to do so by the police or any relevant local or statutory authority;
- To make a report regarding suspected criminal behaviour or a safeguarding incident;
- To enable the Designated Safeguarding Lead or his/her 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 pupil’s parents/guardian will be informed as part of the School’s management of a particular incident;
- To individual data subjects (or their legal representatives) pursuant to a subject access request (as outlined above);
- To the School’s insurance company where required in order to pursue a claim (for example for damage 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 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).

The School reserves the right to obscure images of third parties when disclosing CCTV footage, where we consider it necessary to do so.

## **10. 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 Bursar.

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

If a complainant or enquirer is not satisfied with the response received, they are entitled to contact the ICO. Details of how to do this can be found on the ICO website: [www.ico.org.uk](http://www.ico.org.uk).