

# **CCTV POLICY**

Approved By	Local Governing Committee
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#### 1. Introduction

The purpose of this policy is to regulate the review, management, operation and use, of closed-circuit television (CCTV) at The Radclyffe School. CCTV is in use to increase personal safety of students, staff and visitors and to prevent the loss or damage to property.

This Code follows Data Protection Act guidelines and will be subject to review every 2 years. Governors review all changes, and the policy is published on the school website for access by all stakeholders. Paper copies are available on request. Any significant changes will be by consultation with parents or governors.

## 2. The System

Site	Data Controller		Responsibilities						
TRAC	The Cra Education 1	anmer Trust	Ownership, legislation	operation,	maintenance,	compliance	with	data	protection
PFI	Kier Ma Services	naged	Ownership, legislation	operation,	maintenance,	compliance	with	data	protection

Both systems comprise 119 fixed cameras located around the school site, 87 internally and 32 externally (Appendix 1). The cameras do not record sound. All cameras are monitored from the Kier Office, Main Office or TRAC Reception. Members of the senior leadership team, pastoral team, Facilities team, IT team and OCL staff have access. All teams have their own access to log in from their PCs.

#### 3. Statement of Intent

- 3.1. The CCTV Scheme is registered annually with the Information Commissioner's Office (ICO) by the Trust under the terms of the Data Protection Act 2018. The school treats the system and all information, documents and recordings obtained and used as data which are protected by Data Protection and GDPR legislation and the Commissioner's Code of Practice.
- 3.2. Cameras are used to monitor activities across the school site for the purpose of securing the safety and well-being of the pupils, staff and visitors and to identify criminal activity, actually occurring, anticipated, or perceived.
- 3.3. Staff have been instructed that static cameras are not to focus on private homes, gardens or other areas of private property.
- 3.4. Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. CCTV data will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. CCTV data will never be released to the media for purposes of entertainment.
- 3.5. Where CCTV has captured evidence of criminal behaviour related to the school or its environs, the footage can only be issued in disk format for officers to remove from site for investigative purposes if they present a completed DP7 form (previously a Section 29 form)
- 3.6. It is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage.

## 4. System Equipment & Control

- 4.1. CCTV signage is displayed at site and building entrances.
- 4.2. The system runs 24 hours per day for the full year.
- 4.3. The Kier Site Manager and TRS Buildings Manager will ensure that the CCTV system is fully functioning across both sites, giving priority to any equipment requiring maintenance. If out of hours emergency CCTV maintenance arises, the Kier Site Manager and TRS Buildings Manager

- representative must be satisfied of the identity and purpose of contractors before allowing the maintenance works to commence.
- 4.4. Unless there is a valid (Headteacher approved) need for surveillance, cameras will not be specifically directed at an individual or a specific group of individuals.
- 4.5. Visitors must not be given access to locations where CCTV footage is displayed without good reason. The Kier Site Manager and TRS Buildings Manager must satisfy themselves of the identity of any visitors to their office and the purpose of the visit. Where any doubt exists, access will be refused.
- 4.6. Casual visits to view CCTV will not be permitted. Any visitors (e.g. police) must obtain prior permission from the Headteacher or their nominated representative and must be accompanied throughout the visit.
- 4.7. All requests to view CCTV are logged on the central file located on SharePoint.

### 5. System Access

- 5.1. Access to CCTV footage is restricted. On occasion, other members of staff may be asked to review footage where images are under investigation, to aid with identification.
- 5.2. General access is restricted to:
  - 5.2.1. Senior Leadership Team
  - 5.2.2. Site Management Team
  - 5.2.3. Pastoral Team
  - 5.2.4. ICT Technical Team
  - 5.2.5 Kier Managed Service Staff (PFI CCTV only)
  - 5.2.6 OCL Staff (TRAC CCTV only)

The school office has access to the site entrance, assembly hall and "Street" areas of CCTV footage.

5.3. Any covert surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with school policies and procedures and must be authorised by the Headteacher.

## 6. Image Storage and Sharing Procedures

- 6.1. CCTV footage is retained for 30 days, after which it is automatically overwritten. If footage or images are required to be saved as evidence, the following procedures apply:
  - The required footage (digital or hard copy) will be stored securely in a restricted access location.
  - Only the footage required will be saved, any excess material must be deleted. The footage will be kept for the duration of the investigation or for 12 months, whichever is the lesser amount.
- 6.2. Any external requests to view CCTV data must be in writing to the Headteacher and where appropriate must be accompanied by the appropriate request form from the relevant agency.
- 6.3. The central log must be updated where data is released to an external authorised party and the person collecting must sign a release form (Appendix 2).
- 6.4. Where data is released externally, it remains the property of the school and must be treated in accordance with this policy. The school also retains the right to refuse permission where there is a valid reason to do so.

## 7. Subject Access Requests

7.1. Individuals have the right to request access to CCTV footage relating to themselves under the Data

- Protection Act.
- 7.2. All requests should be made in writing to the Headteacher and should provide sufficient information to enable the footage to be identified, e.g., date, time, location.
- 7.3. The school reserves the right to refuse access to CCTV footage where this would prejudice the rights of other individuals or jeopardise and ongoing investigation.
- 7.4. Where still images are provided, the images of others within the frame must be obscured to prevent identification.

#### 8. Breaches

- 8.1. Any breach of this policy will be investigated by the Headteacher or their nominee and could lead to disciplinary action including dismissal. All breaches must be reported to the Chief Operating Officer of the trust.
- 8.2. A serious breach may warrant an independent investigation and notification to the ICO. Decisions regarding what constitutes a serious breach is determined by the Chief Operating Officer in liaison with the Data Protection Officer.
- 8.3. All breaches must be documented on the trust's central record, with remedial action and changes to procedures as a result of the breach recorded and actioned.

## 9. Assessment of the scheme and code of practice

Performance monitoring, including random operating checks, may be carried out by the Chief Operating Officer or their deputy.

## 10. Complaints

Complaints should be addressed to the Headteacher. See also Complaints Policy.

### 11. Cross references

- Behaviour Policy
- Safeguarding Policy
- Health and Safety Policy
- Complaints Policy

## Appendix 1: Log of Camera Types & Locations

Internal (I)/External (E)	Location	
E	Amphitheatre From Fire Escape	
E	Astroturf And Tennis Courts	
Е	Basketball Court	
E	Bike Sheds	
Е	Courtyard Outside D&T	
E	Field 1	
E	Field 2	
Е	Gates Near Basketball Court	
E	Humanities Fire Escape	
E	Main Car Park - Centre	
E	Main Car Park - Top	
E	Main Drive To Hunt Lane	
E	Main Drive To Student Entrance	
E	Outside English Fire Escape	
E	Outside Entrance To Level 1 Street And Sports Hall	
E	Outside MFL Fire Escape	
E	Outside Sports Hall Fire Escape	
E	Outside Visitors Entrance	
E	PTZ To Courtyard	
E	PTZ To Field	
E	Rear Of Kitchen	
E	Road Between Sports Hall And TRAC	
E	Road Down Side Of TRAC	
E	Sports Store Near Tennis Courts	
E	Steps Towards Humanities Fire Escape	
E	Student Entrance	
E	Student Reception Car Park	
E	TRAC Entrance	
E	TRAC Outside Sports Hall	
E	TRAC Rear Of Indoor Track	
E	Visitors Entrance And Car Park	
E	Visitors Entrance Driveway	
I	Assembly Hall	
I	Cafe Mojo Four	
I	Cafe Mojo One	
I	Cafe Mojo Three	
I	Cafe Mojo Two	
I	Level 1 D&T Corridor Left Hand Side Towards 1B02	
I	Level 1 D&T Corridor Left Hand Side Towards Street	
I	Level 1 D&T Corridor Right Hand Side Towards Fire Escape	
I	Level 1 D&T Corridor Right Hand Side Towards Street	
I	Level 1 Key Stage 4 Year Managers Boys Toilets	
I	Level 1 Key Stage 4 Year Managers Girls Toilets	
I	Level 1 PE Corridor Towards Changing Rooms	

	Level 1 PE Corridor Towards Fire Exit
1	
<u> </u>	Level 1 PE Corridor Towards Sports Hall
	Level 1 PE Corridor Towards Street
1	Level 1 Street From Art
I	Level 1 Street From D&T
I	Level 1 Street From English
Į.	Level 1 Street From Student Reception
I	Level 1 Student Reception Boys Toilets
I	Level 1 Student Reception Girls Toilets
1	Level 1 Year Managers
	Level 2 Admin Corridor Towards Fire Escape
1	Level 2 Admin Corridor Towards Street
· ·	Level 2 Art Towards Fire Escape
'	Level 2 Art Towards Street
!	Level 2 English Boys Toilets
1	Level 2 English Girls Toilets
1	
1	Level 2 English Towards Fire Escape
l	Level 2 English Towards Street
ļ	Level 2 From English
I	Level 2 From Music
1	Level 2 Humanities Girls Toilets
1	Level 2 Humanities Towards Fire Escape
1	Level 2 Humanities Towards Street
I	Level 2 Medical Room Boys Toilets
I	Level 2 MFL Towards Fire Escape
I	Level 2 MFL Towards Street
I	Level 2 Music Corridor Towards Fire Escape
I	Level 2 Music Corridor Towards Street
I	Level 2 Music Girls Toilets
1	Level 2 Near Admin Corridor
1	Level 2 Near Outdoor Steps
Ī	Level 2 SPA Balcony
<u> </u>	Level 2 SPA Corridor Towards 2A01
!	Level 2 Towards Humanities
! 	Level 2 Visitors Reception
1	·
1	Level 3 Computing Corridor Towards Fire Escape
1	Level 3 Computing Corridor Towards Street
<u> </u>	Level 3 From Computing
1	Level 3 From Science
I	Level 3 Library Boys Toilets
I	Level 3 Maths Boys Toilets
I	Level 3 Maths Corridor Towards Fire Escape
I	Level 3 Maths Corridor Towards Street
1	Level 3 Maths Girls Toilets
1	Level 3 Outside Library
I	Level 3 Outside Maths
I	Level 3 Science Boys Toilets
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I	Level 3 Science Corridor Left Hand Side Towards Fire Escape
I	Level 3 Science Corridor Left Hand Side Towards Street
I	Level 3 Science Corridor Right Hand Side Towards Fire Escape
I	Level 3 Science Corridor Right Hand Side Towards Street
I	Level 3 Science Girls Toilets
I	Level 3 SEN Corridor To Library
I	Level 3 SEN Corridor To Maths
I	Level 3 SEN Corridor Towards 3D03
I	Level 3 SEN Corridor Towards Fire Escape
1	Level 3 Towards Library
1	Level 3 Towards Year Managers
1	Level 4 Boys Toilet
1	Level 4 Girls Toilet
I	Level 4 Outside 4E01
1	Level 4 Outside 4E02
1	Level 4 Outside Lift
1	Level 4 Outside Toilets
1	RSC Reception
1	Student Reception
1	TRAC Door To Changing Rooms
1	TRAC Indoor Track 1
1	TRAC Indoor Track 2
I	TRAC Outside 1H03
I	TRAC Outside Gym
1	TRAC Reception 1
I	TRAC Reception 2
I	TRAC Sports Hall 1
I	TRAC Sports Hall 2

## Appendix 2: CCTV Data Release Form

### CCTV Data Release Form

CCTV data can only be released with prior permission by the Headteacher and upon receipt of a formal, authorised request from the third party
Data reference:
Collected by:
Signature:
Name:
Organisation:
Contact details (email / phone):
Released by (TRS):
Date released:

All completed forms to be scanned and saved in the TRS-CCTV SharePoint folder