



# CCTV Policy

<b>Last reviewed on:</b>	March 2026
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<b>Next review due:</b>	March 2027
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<b>Source</b>	Judicium
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<b>Owner</b>	CFOO
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<b>Approver</b>	CEO
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### Version History Log

<b>Version</b>	<b>Description of Change</b>	<b>Date of Policy Release by Judicium</b>
1	Initial issue	06.05.18
2	Spelling corrections	
3	Changes made in regard to CCTV in sensitive areas, sharing with third parties, retention and security practices around portable media devices	19.08.21
4	Formatting amendments	03.08.22
5	Included additional information on CCTV in bathrooms.	30.08.24
6	Included additional guidance around image quality, access to and disclosure of images to data subjects and the complaints process.	01.09.2025
7	Requests for Access by the Data Subject Trust – noted additional paras as highlighted	February 2026

## **Objectives**

The Trust and its schools recognise that CCTV systems can be privacy intrusive.

Review of this policy shall be repeated regularly and whenever new equipment is introduced, a review will be conducted, and a risk assessment put in place. We aim to conduct reviews no later than every two years.

The purpose of the CCTV system is to assist the school in reaching the following objectives:

- (a) To protect pupils, staff and visitors against harm to their person and/or property;
- (b) To increase a sense of personal safety and reduce the fear of crime;
- (c) To protect the school buildings and assets;
- (d) To support the police in preventing and detecting crime;
- (e) To assist in identifying, apprehending and prosecuting offenders;
- (f) To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence; and
- (g) To assist in managing the school.

## **Purpose of This Policy**

The purpose of this policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at the schools. The CCTV system used by the schools in the Trust comprises of:

Blackwell – 26 cameras  
Baldwins Hill – 5 cameras  
Burstow – 8 cameras  
Halsford Park – 3 cameras  
Hatchlands – 4 cameras  
LEAPS – No cameras  
North Downs – 4 cameras  
Sandcross – 12 cameras

### Baldwins Hill Cameras

No.	Type	Location	Sound Y/N	Recording Y/N	Mount type
1	Camera	Main building	N	Y	Fixed
2	Camera	Main building	N	Y	Fixed
3	Camera	Main building	N	Y	Fixed
4	Camera	Main building	N	Y	Fixed

### Blackwell School CCTV Cameras

No.	Type	Location	Sound Y/N	Recording Y/N	Mount type
1	Dome camera	Outside PPA room	N	Y	Fixed (but can be adjusted)
2	Dome camera	Outside old main door	N	Y	Fixed (but can be adjusted)
3	Bullet camera	Outside hall doors	N	Y	Fixed (but can be adjusted)
4	Bullet camera	Above Chartwell kitchen facing car park	N	Y	Fixed (but can be adjusted)
5	Dome camera	Above community room facing vehicle gate	N	Y	Fixed (but can be adjusted)
6	Dome camera	Outside Squirrel's year R	N	Y	Fixed (but can be adjusted)
7	Dome camera	Outside Hedgehog's year R	N	Y	Fixed (but can be adjusted)
8	Dome camera	Outside link corridor - upper playground	N	Y	Fixed (but can be adjusted)
9	Dome camera	Outside Honeybee's year 1 - top playground	N	Y	Fixed (but can be adjusted)
10	Dome camera	Outside Hedgehogs year R	N	Y	Fixed (but can be adjusted)
11	Dome camera	Outside link corridor towards year 1	N	Y	Fixed (but can be adjusted)
12	Dome camera	Outside Rabbit's year 2	N	Y	Fixed (but can be adjusted)
13	Dome camera	Inside old entrance lobby	N	Y	Fixed (but can be adjusted)
14	Dome camera	Outside community room facing steps	N	Y	Fixed (but can be adjusted)
15	Dome camera	Outside Head Teacher's office facing top playground	N	Y	Fixed (but can be adjusted)
16	Dome camera	Outside Hazel year 4 facing lower playground	N	Y	Fixed (but can be adjusted)
17	Dome camera	Front of school facing car park	N	Y	Fixed (but can be adjusted)
18	Dome camera	Inside main foyer	N	Y	Fixed (but can be adjusted)

19	Dome camera	Above outside PE store facing playing field	N	Y	Fixed (but can be adjusted)
20	Dome camera	Outside Cedar year 5 on balcony facing lower playground	N	Y	Fixed (but can be adjusted)
21	Dome camera	Outside year 4/6 cloak room facing Star Garden	N	Y	Fixed (but can be adjusted)
22	Dome camera	Outside year 4 cloak room facing trim trail	N	Y	Fixed (but can be adjusted)
23	Dome camera	Outside Ash year 6 on balcony facing lower playground	N	Y	Fixed (but can be adjusted)
24	Dome camera	Outside Willow year 4 facing playing field	N	Y	Fixed (but can be adjusted)
25	Dome camera	Above old plant room covering side passage left	N	Y	Fixed (but can be adjusted)
26	Dome camera	Above old plant room covering side passage right	N	Y	Fixed (but can be adjusted)

### **Burstow Cameras**

No.	Type	Location	Sound Y/N	Recording Y/N	Mount type
1	Camera	Car Park	N	Y	Fixed (but can be adjusted)
2	Camera	Car Park	N	Y	Fixed (but can be adjusted)
3	Camera	Main Office	N	Y	Fixed (but can be adjusted)
4	Camera	Reception area	N	Y	Fixed (but can be adjusted)
5	Camera	Field	N	Y	Fixed (but can be adjusted)
6	Camera	Main gates	N	Y	Fixed (but can be adjusted)
7	Camera	Front of bungalow	N	Y	Fixed (but can be adjusted)
8	Camera	Swimming pool	N	Y	Fixed (but can be adjusted)

### **Halsford Park Cameras**

No.	Type	Location	Sound Y/N	Recording Y/N	Mount type
1	SV3C	Main building	N	Y	Fixed
2	SV3C	Main building	N	Y	Fixed
3	SV3C	Huts	N	Y	Fixed

### Hatchlands Primary Cameras

No.	Type	Location	Sound Y/N	Recording Y/N	Mount type
1	Dome camera	Main building	N	Y	Fixed
2	Dome camera	Main building	N	Y	Fixed
3	Dome camera	Main building	N	Y	Fixed
4	Dome camera	Main building	N	Y	Fixed

### Leaps Nursery Cameras

	N/A				
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### North Downs Cameras

No.	Type	Location	Sound Y/N	Recording Y/N	Mount type
		<b>Brockham</b>			
1	Camera	Above entry door	N	N	Fixed
2	Camera	Outside resources room	N	N	Fixed
		<b>Betchworth</b>			
1	Camera	Entry phone on gate	N	N	Fixed
		<b>Leigh</b>			
1	Camera	Main building - front	N	N	Fixed

### Sandcross Primary Cameras

No.	Type	Location	Sound Y/N	Recording Y/N	Mount type
1	Dome camera	Main building	N	Y	Fixed (but can be adjusted)
2	Dome camera	Main building	N	Y	Fixed (but can be adjusted)
3	Dome camera	Main building	N	Y	Fixed (but can be adjusted)
4	Dome camera	Main building	N	Y	Fixed
5	Dome camera	Nursery Building	N	Y	Fixed
6	Dome camera	Nursery Building	N	Y	Fixed
7	Dome camera	Yr 5 Outbuilding	N	Y	Fixed
8	Dome camera	Staff Carpark (front)	N	Y	Fixed
9	Dome camera	Staff Carpark (Back)	N	Y	Fixed
10	Dome camera	Staff Carpark (Back)	N	Y	Fixed
11	Dome camera	Automated Gates (Front)	N	Y	Fixed
12	Dome camera	Automated Gated (Back)	N	Y	Fixed

CCTV cameras are not installed in areas in which individuals would have an expectation of privacy such as toilets, changing facilities, etc.

### **Statement of Intent**

CCTV cameras are installed in such a way that they are not hidden from view. We do not covertly record anyone. Signs are predominantly displayed where relevant so that staff, students, visitors and members of the public are made aware that they are entering an area covered by CCTV. The signs also contain contact details as well as a statement of purposes for which CCTV is used.

The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.

The school will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

The system has been designed so far as possible to deny observation on adjacent private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design have endeavoured to ensure that the system will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner, will be clearly visible on the site and make clear who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

CCTV images are not retained for longer than necessary, taking into account the purposes for which they are processed. Data storage is automatically overwritten by the system after a period of 30 days.

Recorded images will only be retained long enough for any incident to come to light (e.g., for a theft to be noticed) and the incident to be investigated. In the absence of a compelling need

to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 6 months.

### **System Management**

Access to the CCTV system and data shall be password protected and will be kept in a secure area.

The CCTV system will be administered and managed by at school level who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager, the system will be managed by Trust Premises Manager.

The system and the data collected will only be available to the Systems Manager, his/her replacement and appropriate members of the senior leadership team as determined by the Headteacher.

The CCTV system is designed to be in 24 hours each day, every day of the year, though the school does not guarantee that it will be working during these hours.

The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that the cameras are functional.

Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by proving clear, usable images. Images produced by the equipment must be as clear as possible so that they are effective. To achieve this, we will ensure that:

- (a) the equipment is properly installed, serviced, checked and maintained (and maintenance logs maintained) to ensure it works properly;
- (b) any recording media, if needed, will be of good quality and will be replaced if the quality of the images has begun to deteriorate;
- (c) where time/date of images are recordable, the equipment will be set accurately and this will be regularly checked and documented;
- (d) cameras will be correctly positioned;
- (e) assessments will be made as to whether constant real-time recording is necessary, or if recording can be limited to those times when suspect activity is likely to occur;
- (f) cameras will be protected from vandalism so far as is possible; and
- (g) if cameras break down or are damaged, the Estates Manager will liaise with our IT provider/CCTV provider to arrange timely repair.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

Where a person other than those mentioned above requests access to the CCTV data or system, the System Manager must satisfy him/herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists, access will be refused.

Details of all visits and visitors will be recorded in a system logbook including time/data of access and details of images viewed and the purpose for so doing.

### **Downloading Captured Data on to Other Media**

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings), any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures: -

- (a) Each downloaded media must be identified by a unique mark.
- (b) Before use, each downloaded media must be cleaned of any previous recording.
- (c) The System Manager will register the date and time of downloaded media insertion, including its reference.
- (d) Downloaded media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a downloaded media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.
- (e) If downloaded media is archived, the reference must be noted.
- (f) If downloaded media is put onto a device, the device will be encrypted, and password protected.

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his/her replacement and the Head Teacher and other authorised senior leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable, if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the downloaded media (and any images contained thereon) remains the property of the school and downloaded media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a

downloaded media, this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the school to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until needed by the police.

Applications received from outside bodies (e.g., solicitors or parents) to view or release images will be referred to the trusts/school's Data Protection Officer and a decision made by a senior leader of the school in consultation with the school's Data Protection Officer.

### **Requests for Access by the Data Subject**

The Data Protection Act provides data subjects – those whose image has been captured by the CCTV system and can be identified - with a right to access data held about themselves, including those obtained by CCTV. Requests for such data should be made directly to the school.

Please refer to our Data Protection Policy with Subject Access Request appendix for further details. If we cannot comply with the request, the reasons for not being able to comply will be documented and the data subject will be advised of these in writing.

The assigned manager responsible for the CCTV system will liaise with the Data Protection Officer, Judicium Consulting, and the school's Designated Safeguarding Lead to determine whether disclosure of the images will reveal third-party information, to assess the risks involved with disclosure and the reasonableness in disclosure.

Particular care should be exercised when images of other people are included in the materials for disclosure. Images of other individuals will, if possible, be redacted unless there would be an expectation that their images would be released in such circumstances. Non-disclosure will be appropriate in most circumstances. If there is any doubt about what information must be provided to enquirers, please contact the school's Data Protection Officer, Judicium Consulting.

### **Complaints**

Complaints and enquiries about the operation of our CCTV systems should be made by staff in line with our Grievance Procedure, and by customers and visitors, under our complaints procedure.

If a member of staff believes that there has been a breach of the Data Protection Act, or any other legal obligations, they should contact the Headteacher for school breaches and the CFOO for trust breaches, as a matter of urgency in accordance with the data breach reporting process set out in our Data Breach Policy.

### **Public Information**

Copies of this policy will be available to the public from the school office.