The Chantry School

CCTV policy

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1 Aims

This policy aims to set out the school's approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on school property.

1.1 The purpose of the CCTV system is to:

- Make members of the school community feel safe
- Protect members of the school community from harm to themselves or to their property
- Deter criminality in the school
- Protect school assets and buildings
- Assist police to deter and detect crime
- Determine the cause of accidents
- Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings
- To assist in the defense of any litigation proceedings

The CCTV system will not be used to:

- Encroach on an individual's right to privacy
- Monitor people in spaces where they have a heightened expectation of privacy i.e. toilet cubicles, urinals and changing rooms.

- Follow particular individuals, unless there is an ongoing emergency incident occurring
- Pursue any other purposes than the ones stated above

The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

The CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The system complies with the requirements of the Data Protection Act 2018 and the UK GDPR.

Footage or any information gleaned through the CCTV system will never be used for commercial purposes.

In the unlikely event that the police request that CCTV footage be released to the media, the request will only be complied with when written authority has been provided by the police, and only to assist in the investigation of a specific crime.

The footage generated by the system should be of good enough quality to be of use to the police or the court in identifying suspects.

2 Relevant legislation and guidance

This policy is based on:

2.1 Legislation

- UK General Data Protection Regulation
- Data Protection Act 2018
- Human Rights Act 1998
- European Convention on Human Rights
- The Regulation of Investigatory Powers Act 2000
- The Protection of Freedoms Act 2012
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998
- The Children Act 1989
- The Children Act 2004
- The Equality Act 2010

2.2 Guidance

- Surveillance Camera Code of Practice (2021)

3 Definitions

Surveillance: the act of watching a person or a place

CCTV: closed circuit television; video cameras used for surveillance

Covert surveillance: operation of cameras in a place where people have not been made aware they are under surveillance

4 Covert surveillance

Covert surveillance will only be used in extreme circumstances, such as where there is suspicion of a criminal offence. If the situation arises where covert surveillance is needed (such as following police advice for the prevention or detection of crime or where there is a risk to public safety), a data protection impact assessment will be completed in order to comply with data protection law.

5 Location of the cameras

Cameras are located in places that require monitoring in order to achieve the aims of the CCTV system (stated in appendix 1).

For camera locations see appendix 1.

Wherever cameras are installed appropriate signage is in place to warn members of the school community that they are under surveillance. The signage:

- Identifies the school as the operator of the CCTV system
- Identifies the school as the data controller
- Provides contact details for the school

Cameras are not and will not be aimed off school grounds into public spaces or people's private property.

Cameras are positioned in order to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

6 Roles and responsibilities

6.1 The local governing board

The governing board has the ultimate responsibility for ensuring the CCTV system is operated within the parameters of this policy and that the relevant legislation (defined in section 2.1) is complied with.

6.2 The headteacher

The headteacher will:

- Take responsibility for all day-to-day leadership and management of the CCTV system
- Liaise with the school data protection lead (DPL) and network manager (NM) to ensure that the use of the CCTV system is in accordance with the stated aims and that its use is needed and justified
- Ensure that the guidance set out in this policy is followed by all staff
- Review the CCTV policy to check that the school is compliant with legislation
- Ensure all persons with authorisation to access the CCTV system and footage have received proper training in the use of the system and in data protection

- Sign off on any expansion or upgrading to the CCTV system, after having taken advice from the DPL and NM and having taken into account the result of a data protection impact assessment
- Decide, in consultation with the DPL, whether to comply with disclosure of footage requests from third parties
- Seek advice from the MAT DPO on more complex issues as needed.

6.3 The MAT data protection officer (DPO)

The DPO will:

- Provide data protection support and advice as needed and make periodic checks on the system in place to ensure that the school is compliant.
- Train all staff to recognise a subject access request
- Monitor compliance with UK data protection law
- Advise on and assist the school with carrying out data protection impact assessments
- Act as a point of contact for communications from the Information Commissioner's Office (ICO)
- Conduct data protection impact assessments
- Ensure data is handled in accordance with data protection legislation
- Ensure footage is obtained in a legal, fair and transparent manner
- Ensure footage is destroyed when it falls out of the retention period
- Keep accurate records of all data processing activities and make the records public on request
- Inform subjects of how footage of them will be used by the school, what their rights are, and how the school will endeavour to protect their personal information
- Ensure that the CCTV systems are working properly and that the footage they produce is of high quality so that individuals pictured in the footage can be identified
- Ensure that the CCTV system is not infringing on any individual's reasonable right to privacy in public spaces
- Receive and consider requests for third-party access to CCTV footage

6.4 The network manager

The system manager will:

- Take care of the day-to-day maintenance and operation of the CCTV system
- Train persons with authorisation to access the CCTV system and footage in the use of the system and in data protection in this area
- Oversee the security of the CCTV system and footage
- Check the system for faults and security flaws.
- Ensure the data and time stamps are accurate

6.5 The local data protection lead (DPL) & Business Manager

- Support the Headteacher and DPO as required.
- Deal with subject access requests in line with the UK GDPR and Data Protection Act 2018
- Update the Trust SAR / breach logging system with new events and new information when required.
- Meet with Trust data leads as directed by the DPO.
- Support the NM with the CCTV maintenance and changes

7 Operation of the CCTV system

The CCTV system will be operational 24 hours a day, 365 days a year.

The system is registered with the Information Commissioner's Office.

The system will not record audio in classrooms but records audio in designated communal areas.

Recordings will have date and time stamps. This will be checked by the NM and when the clocks change.

8 Storage of CCTV footage

Footage will be retained for 30 days. At the end of the retention period, the files will be overwritten automatically.

On occasion footage may be retained for longer than 30 days, for example where a law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation.

Recordings will be downloaded and encrypted, so that the data will be secure and its integrity maintained, so that it can be used as evidence if required.

9 Access to CCTV footage

Access will only be given to authorised persons, for the purpose of pursuing the aims stated in section 1.1, or if there is a lawful reason to access the footage.

Any visual display monitors will be positioned so only authorised personnel will be able to see the footage.

9.1 Staff access

The following members of staff have authorisation to access the CCTV footage but access will only be granted by the Headteacher depending on the event that has occurred:

- The Headteacher
- The Leadership Team
- The Trust DPO
- The IT Team

- Behaviour / Pastoral based staff
- Site Manager (if the event is building related)
- Anyone else with the express permission of the Headteacher / DPL

CCTV footage will only be accessed from authorised personnel's work devices, or from the visual display monitors.

All members of staff who have access will undergo training to ensure proper handling of the system and footage.

Any member of staff who misuses the surveillance system may be committing a criminal offence, and will face disciplinary action.

9.2 Subject access requests (SAR)

According to the UK GDPR and Data Protection Act 2018, individuals have the right to request a copy of any CCTV footage of themselves.

Upon receiving SAR the school will immediately issue a receipt and will then respond within 1 calendar month.

All staff have received training to recognise SARs. When a SAR is received staff should inform the Headteacher in writing. When making a request, individuals should provide the school with reasonable information such as the date, time and location the footage was taken to aid school staff in locating the footage.

On occasion the school will reserve the right to refuse a SAR, if, for example, the release of the footage to the subject would prejudice an ongoing investigation.

Images that may identify other individuals need to be obscured to prevent unwarranted identification. The school will attempt to conceal their identities by blurring out their faces, or redacting parts of the footage. If this is not possible the school will seek their consent before releasing the footage. If consent is not forthcoming the still images may be released instead.

The school reserves the right to charge a reasonable fee to cover the administrative costs of complying with a SAR that is repetitive, unfounded or excessive.

Footage that is disclosed in a SAR will be disclosed securely to ensure only the intended recipient has access to it.

If the footage is accepted via OneDrive from the intended recipient, a link is shared which cannot be shared with others or downloaded. If footage is not accepted via OneDrive then it will be saved and shared using an encrypted memory stick with the permission of the headteacher.

Records will be kept that show the date of the disclosure, details of who was provided with the information (the name of the person and the organisation they represent), and why they required it.

Individuals wishing to make an SAR can find more information about their rights, the process of making a request, and what to do if they are dissatisfied with the response to the request on the ICO website.

9.3 Third-party access

CCTV footage will only be shared with a third party to further the aims of the CCTV system set out in section 1.1 (e.g. assisting the police in investigating a crime).

Footage will only ever be shared with authorised personnel such as law enforcement agencies or other service providers who reasonably need access to the footage (e.g. investigators).

All requests for access should be set out in writing and sent to the headteacher and the DPO.

The school will comply with any court orders that grant access to the CCTV footage. The school will provide the courts with the footage they need without giving them unrestricted access. The Headteacher / DPO will consider very carefully how much footage to disclose, and seek legal advice if necessary.

The Headteacher / DPO will ensure that any disclosures that are made are done in compliance with the UK GDPR.

All disclosures will be recorded by the DPO.

10 Data protection impact assessment (DPIA)

The school follows the principle of privacy by design. Privacy is taken into account during every stage of the deployment of the CCTV system, including its replacement, development and upgrading.

The system is used only for the purpose of fulfilling its aims (stated in section 1.1).

When the CCTV system is replaced, developed or upgraded a DPIA will be carried out to be sure the aim of the system is still justifiable, necessary and proportionate.

The DPO will provide guidance on how to carry out the DPIA. The DPIA will be carried out by the Network Manager.

Those whose privacy is most likely to be affected, including the school community and neighbouring residents, will be consulted during the DPIA, and any appropriate safeguards will be put in place.

A new DPIA will be done whenever cameras are moved, and/or new cameras are installed.

If any security risks are identified in the course of the DPIA, the school will address them as soon as possible.

11 Security

- The NM will be responsible for overseeing the security of the CCTV system and footage
- The system will be checked for faults periodically.
- Any faults in the system will be reported as soon as they are detected and repaired as soon as possible, according to the proper procedure
- Footage will be stored securely and encrypted wherever possible
- The CCTV footage will be password protected and any camera operation equipment will be securely locked away when not in use
- Proper cyber security measures will be put in place to protect the footage from cyber attacks
- Any software updates (particularly security updates) published by the equipment's manufacturer that need to be applied, will be applied as soon as possible

12 Complaints

Complaints should be directed to the headteacher and should be made according to the school's complaints policy.

13 Monitoring

The policy will be reviewed annually by the DPL to consider whether the continued use of a surveillance camera remains necessary, proportionate and effective in meeting its stated purposes.

14 Links to other policies

- Data protection policy
- Privacy notices for parents/carers, pupils, staff, governors and suppliers
- Safeguarding policy

15 Equality Impact

The School's responsibilities towards promoting equality, diversity and inclusion have been considered when drafting this policy

Appendix 1

CCTV Camera Locations (Sept. 2026)

Location – Unifi CCTV	Primary Reasoning(s) for Location
Pupil Entrance next to new Reception – camera above Library doors	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
MFL / Library Corridor – camera on wall near L1	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Library Computer Area – camera above teaching wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Café 1 from internal door hall side – camera next to entrance doors	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Café 2 from external door – camera above external doors	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Conference Room Corridor / cleaning cupboard – camera above lift	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
IT3 Classroom Drama Block – camera above teaching wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Staff Room / back of kitchen – camera on DT block	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Main School Access / Ramp – camera on corner of new Resources office	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils. Identification of visitors at barrier control by reception. Monitor traffic and parking incidents.
Car park long bin area – camera on corner of Drama Block	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils. Monitor traffic and parking incidents.
Path to old Reception – camera on Head's Office	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.

Area between Drama and Main Block – camera on BSU wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Hall Patio – camera on Head's Office	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Back of Café / front of Humanities – camera on Music Block	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Music Fire Escape – camera above fire exit doors next to public footpath	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Music and Maths patio / driveway – camera on Music Block	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Ramp to DT / driveway – camera on DT block	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
DT Main Entrance – camera on DT wall picking up corner of public footpath	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Behind DT block – camera on back of Food next to public footpath	Identification of unauthorised individuals / crime prevention and security.
Gym Doors Corridor / Lockers – camera on wall opposite front entrance doors	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Gym Corridor leading to Science / Lockers – camera above back entrance doors	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Fire Exit / Public Footpath back of Science Block – camera above fire exit doors	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Science Patio – camera above catering pod	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Rear Science staircase / fire exit / lockers – camera above fire exit doors	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Near Science staircase / lockers – camera opposite entrance doors	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Boys toilet Science block – camera facing sinks	Prevent poor pupil behaviour / protect pupils.
Girls toilet Science block – camera facing sinks	Prevent poor pupil behaviour / protect pupils.
Carol Courtyard – camera on Science block wall facing Café	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Concourse	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
English Landing	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Art Landing	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
IT1 Above teaching wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
IT2 Above teaching wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Science lower corridor	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Science upper corridor	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.

DT corridor	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.

Location Hikvision 1 (2018) - Humanities	**Primary Reasoning(s) for Location**
Back of H3 facing towards Science – camera on H3 Exterior Wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Humanities rear doors / towards Carol Courtyard – camera on H3 Exterior Wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Downstairs corridor / boys toilet – camera above H3 classroom	Prevent poor pupil behaviour / protect pupils.
Downstairs Main Entrance girls and staff toilets – camera above H2 classroom	Prevent poor pupil behaviour / protect pupils.
Downstairs Corridor leading to stairs – camera above main entrance doors	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Internal Staircase – camera above stair level 1	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Upstairs doors to top of stairs / H4 entrance – Camera opposite H4	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Upstairs doors to external staircase / girls & boys toilets – camera above H5	Prevent poor pupil behaviour / protect pupils.
Upstairs corridor H4/H5 – camera above H6 classroom	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Driveway / social space leading to block – camera on H1 external wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Humanities main entrance / Carol Courtyard – camera on café wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Front of Humanities / music steps / social space – camera on M5 wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Science corridor ground floor gym side *(installation in progress)*	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Science corridor ground floor far end *(installation in progress)*	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Science corridor first floor gym side *(installation in progress)*	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Science corridor first floor gym side *(installation in progress)*	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.

Location Hikvision 2 (2017) - Maths	**Primary Reasoning(s) for Location**
Back of New Maths Block / public footpath – camera on external M4	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Music Fire doors – camera on corner of M4	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Music patio / between Maths blocks – camera on corner of M4	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Music patio / front entrance – camera on M4 wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Outside M5 / between Maths blocks – camera on M3 wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.

Outside M6/M7 between Maths blocks – camera on M3 wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Back of new Maths / public footpath – camera on M2 wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Outside M6/M7 between Maths blocks – camera on M2 wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
DT Food external / between Maths & DT – camera on M1 wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.

Location Hikvision 3 (2021) – Main Block	**Primary Reasoning(s) for Location**
Staff parking / driveway – camera on Resources wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils. Monitor traffic and parking incidents.
Reception / Resources corridor – camera above Resources door	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
External reception door / ramp – camera above reception door	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Staff parking / zebra crossing / stores – camera on Resources wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils. Monitor traffic and parking incidents.
Girls Toilet – camera in lobby area	Prevent poor pupil behaviour / protect pupils.
Isolation Room	Prevent poor pupil behaviour / protect pupils.
Reception waiting area – camera on wall opposite main door	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Pupil Entrance / sports hall path – camera above entrance doors	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Boys Toilet – camera in lobby area	Prevent poor pupil behaviour / protect pupils.
Back entrance corridor – camera opposite back doors	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Dining Room – camera above main entrance	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Café Extension – camera above open doorway	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Hall Corridor – camera on corridor wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Science Patio far end – camera under canopy *(installation in progress)*	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.
Gym Store – camera pointing to canopy from side *(installation in progress)*	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils.

Location Hikvision 4 (2021) – Sports Hall	**Primary Reasoning(s) for Location**
Front Entrance – camera pointing down form corner of building	Identification of unauthorised individuals / crime prevention and security.
Car Park Bay 1 – camera off wall to left of reception	Identification of unauthorised individuals / crime prevention and security. Monitor traffic and parking incidents.
Car Park Bay 2 – camera off wall to right of reception	Identification of unauthorised individuals / crime prevention and security. Monitor traffic and parking incidents.

Back of main hall / tennis courts	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils and public
Sports Pitches	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils and public
Side Entrance / pathway to main school	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils and public
Climbing Wall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils and public
Main Hall	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils and public
Plant Room	Identification of unauthorised individuals / crime prevention and security.
Reception	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils and public
Fitness Suite	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils and public
Public Corridor	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils and public
Dance Studio	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils and public
PE Corridor	Identification of unauthorised individuals / crime prevention and security. Prevent poor pupil behaviour / protect pupils and public