

Surveillance and CCTV Policy

for the whole School including EYFS

Policy reviewed by	Bursar
Date Reviewed on	August 2026
SLT Review Period	Annually
Next SLT (Bursar) Review Date Due	September 2027
Governor Review Period	Annually
Governing Committee	Finance and Estates
Approved by Governors On	September 2026
Next Governor Review Due	September 2027

SURVEILLANCE and CCTV POLICY

From September 2026 onwards

Statement of Intent

The purpose of this policy is to regulate the management and operation of the surveillance and Closed Circuit Television (CCTV) System at Edge Grove School (the School). It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the School and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the System).

The System is administered and managed by the School, who acts as the Data Controller. This policy will be subject to review from time to time, and should be read with reference to the School's Data Protection Policy. All fixed cameras are in plain sight on the School premises and the School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds.

Legal Framework

This policy has due regard to all relevant legislation including, but not limited to, the following:

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

This policy operates in conjunction with the following statutory and non-statutory guidance:

- Home Office 'The Surveillance Camera Code of Practice'
- ICO 'A guide to the data protection principles'
- ICO 'CCTV and video surveillance'
- DfE 'Data protection in schools'
- Biometrics and Surveillance Camera Commissioner 'Surveillance Camera Code of Practice'

The School's purposes of 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.

1. Objectives of the System

- 1.1 To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 1.2 To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- 1.3 To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- 1.4 To monitor the security and integrity of the School site and deliveries and arrivals.
- 1.5 To monitor staff and contractors when carrying out work duties.
- 1.6 To monitor and uphold discipline among pupils in line with the Behaviour Policy and School Rules, which are available to parents and pupils on request.

2. Positioning

- 2.1 Locations have been selected, both inside (communal areas) and externally, that the School reasonably believes require monitoring to address the stated objectives.
- 2.2 Adequate signage has been placed in prominent positions to inform staff, pupils and visitors that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.
- 2.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- 2.4 No images of public spaces will be captured except to a limited extent at site entrances.

3. Maintenance

- 3.1 The CCTV System will be operational 24 hours a day, every day of the year.
- 3.2 The System Manager (defined below) will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
- 3.3 The System will be checked and (to the extent necessary) serviced no less than annually.

4. Supervision of the System

- 4.1 Staff authorised by the School to conduct routine supervision of the System may include maintenance staff, day or night security and relevant staff on duty.
- 4.2 Images will 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. Storage of Data

- 5.1 The day-to-day management of images will be the responsibility of the Bursar who will act as the System Manager, or such suitable person as the System Manager shall appoint.
- 5.2 Images will be stored for a maximum of 4 weeks, and automatically over-written unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.
- 5.3 Where such data is retained, it will be retained in accordance with the Act and our Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded in the system log book.

6. Access to Images

- 6.1 Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
- 6.2 Individuals also have the right to access personal data the School holds on them (please see the Data Protection Policy), including information held on the System, if it has been kept. The School will require specific details including at least to 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.
- 6.3 The System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV images:
 - 6.3.1 Where required to do so by the Head, the Police or some relevant statutory authority;
 - 6.3.2 To make a report regarding suspected criminal behaviour;
 - 6.3.3 To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
 - 6.3.4 To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian will be informed as part of the School's management of a particular incident;
 - 6.3.5 To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 6.2 above;
 - 6.3.6 To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
 - 6.3.7 In any other circumstances required under law or regulation.

6.4 Where images are disclosed under 6.3 above 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).

6.5 Where images are provided to third parties under 6.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

7. Other CCTV systems

7.1 The School does not own or manage third party CCTV systems, but may be provided by third parties with images of incidents where this is in line with the objectives of the School's own CCTV policy.

7.2 Pupils may travel to School Offsite Visits on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The School may use these in establishing facts in cases of unacceptable pupil behaviour, in which case the parents/guardian will be informed as part of the School's management of a particular incident.

8. Complaints, queries and Access requests

8.1 Any complaints or queries in relation to the School's CCTV system, or its use of CCTV should be referred to the Data Protection Manager at dataprotection@edgegrove.com.

8.2 Individuals have the right to submit an SAR to gain access to their personal data in order to verify the lawfulness of the processing. SARs will be handled in accordance with the Subject Access Request (SAR) Policy.

8.3 Individuals maintain the right to have personal data erased if:

- The data is no longer necessary for the original purpose it was collected for.
- They are relying on legitimate interests as a basis for processing, the individual objects to the processing of their data, and there is no overriding legitimate interest to continue the processing.
- The data has been processed unlawfully.
- There is a specific legal obligation.

8.4 There are certain exceptions where the right to erasure cannot be exercised, these include, but are not limited to:

- Where the processing is needed for the performance of a task in the public interest or an official authority.
- Compliance with a specific legal obligation.

8.5 As an alternative to the right of erasure, individuals can limit the way their data is used if they have issues with the content of the data held by the school or they object to the way it was processed.

Data can be restricted by either:

- Moving the data to another processing system.
- Making the data unavailable to users.
- Temporarily removing published data from a website.

8.6 The school will verify the identity of the person making the request before any information is supplied. It is important that access to, and disclosure of, the images recorded by surveillance and CCTV footage is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact, should the images be required for evidential purposes.

8.7 The school will ensure that all recorded CCTV footage is stored securely to maintain its confidentiality, integrity and availability.

- 8.8 Access to CCTV footage will be strictly controlled. Only authorised members of staff will be permitted to view, retrieve or manage CCTV recordings. This will ensure that the rights of any recorded persons are protected at all times.
- 8.9 The school will regularly review access permissions to ensure they remain appropriate, particularly where staff roles change or individuals leave the organisation.
- 8.10 The school will implement appropriate technical and organisational measures to prevent unauthorised access to CCTV data;
- Restricting access to designated staff only.
 - Implementing appropriate security controls and safeguards.
 - Ensuring CCTV equipment and control rooms are physically secure.
 - Applying regular software updates and security patches.
- 8.11 The school will ensure that all staff with access to CCTV systems:
- Are appropriately trained in the use of the system.
 - Understand their responsibilities in relation to data protection.
 - Are familiar with relevant school policies on the handling of personal data.
- 8.12 Releasing the recorded images to third parties will be permitted only in the following limited and prescribed circumstances, and to the extent required or permitted by law:
- The police – where the images recorded would assist in a specific criminal inquiry
 - Prosecution agencies – such as the Crown Prosecution Service (CPS)
 - Relevant legal representatives – such as lawyers and barristers
 - Persons who have been recorded and whose images have been retained where disclosure is required by virtue of data protection legislation and the Freedom of Information Act 2000
- 8.13 Requests for access or disclosure will be recorded and the Bursar will make the final decision as to whether recorded images may be released to persons other than the police.

Bursar and Data Protection Manager
July 2026



CCTV FOOTAGE ACCESS REQUEST

The following information is required before the school can provide copies of or access to CCTV footage from which a person believes they may be identified.

Please note that CCTV footage may contain the information of others that needs to be protected, and that the school typically deletes CCTV recordings after a 4 week period.

Name and address: (proof of ID may be required)	
Description of footage (including a description of yourself, clothing, activity etc.)	
Location of camera	
Date of footage sought	
Approximate time (give a range if necessary)	

Signature*

Print Name.....

Date

**** NB if requesting CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 or over, the child's authority or consent must be obtained except in circumstances where that would clearly be inappropriate and the lawful reasons to provide to the parent(s) outweigh the privacy considerations of the child.***