



400 YEARS OF EXCELLENCE

Policy Governing Operation of CCTV

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Policy review date	July 2027
Policy Lead	Matthew Greenwood, Deputy Headteacher
Governor or SLT approval	Governor Approval
Governor committee responsible for policy	Finance

General Data Protection Regulations 2018

Rationale

Closed circuit television is installed and operated at Richard Hale School for security and health and safety purposes. Images from the installed cameras may be viewed and recorded.

Usually the CCTV equipment and the images recorded by it are controlled by the Headteacher and Deputy Headteacher who are responsible for how the system is used. Occasionally, the CCTV system may be shared with another organisation, such as a facilities management company, or an organisation that provides out of school hours activities. It may be the case that, in these scenarios, there are joint data controllers responsible for the CCTV system. Where this is the case, the joint data controller is listed below.

Aims

The purpose of this policy is to regulate the management, operation and use of the CCTV system at Richard Hale School and to ensure compliance with the current legislation.

Article 6 (1) (e) of the General Data Protection Regulation provides the school with a lawful basis for processing CCTV images where 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'.

Objectives of this CCTV Policy are:

- a) To increase personal safety of pupils, staff and visitors, and reduce the fear of crime
- b) To protect the school buildings and their assets
- c) To support the Police in a bid to deter and detect crime
- d) To assist in identifying, apprehending and potentially prosecuting offenders
- e) To protect members of the public and private property
- f) To assist in managing the school.

Procedures

Positioning of cameras

The system comprises a number of fixed cameras located within the school grounds.

Camera name (blue internal; red external)	Camera ref no.
A1 - Sci Main Hall	A1
A4 - DT	A4
A5 - DT Fire exit	A5
A6 - Main Hall Bike Rack	A6
A7 - Drama - Car park	A7
A8 - Car park Main Ent	A8
A10 - New Block Back-Tennis	A10
A11 - New Block Back Sci	A11
A12 - NB Sci Courtyard	A12
B1 - MB Benches - Lunch que	B1

B2 - MB-Maths walkway	B2
B4 - Maths-Gym	B4
B5 - Behind Gym	B5
B6 - B6 Music Access Ent	B6
B7 - Music Back	B7
B9 - Music -6th Ent	B9
B10 - Art-Under-MB	B10
B12 - Drama Ent-Int	B12
C1 - Dining Left	C1
C2 - Dining Right	C2
C3 - 6th Roof	C3
C4 - Gym Ent	C4
C6 - 6th Common Right	C5
C5 - 6th Common Left	C6
C7 - 6th Common Left	C7
C8 - 6th Common Right	C8
C9 - 6thCommonMez	C9
C10 - 6thCommonBalc	C10
C11 - MBEnt-Gym	C11
C12 - 6thEnt-Music	C12
D3 - SciStairsG	D3
D4 - LunchQue Courtyard	D4
D6 - MBMainEnt-Int	D6
Gate Ped Hale Road Junction	BND1
Bound Hale Rd JuncPed Field	BND2
Gate Subway	BND3
Gate Pegs Lane Ped	BND4
Bound Hale road Car Park Entry	BND5
Gate ANPR Hale Road Car Entrance	BND7
Gate ANPR Pegs Lane Car Entrance	BND8
3GP Car Park	BND9
Gate Pegs Lane Car Park Exit	BND10
Gate Pegs Lane Pedestrian Inside	BND11
Sports Hall Boiler	SPH1
Sports Hall Main Right	SPH2
Sports Hall Changing rooms	SPH3
Sports Hall Toilets	SPH4
Sports Hall Main Left	SPH5
Sports Hall Back CP Exit	SPH6

Sports Hall Path	SPH7
Sports Hall - Pete's drive way	SPH8
Sports Hall Main Entrance	SPH9
Sports Hall Main Carpark	SPH10
Sports Hall Cleaning/Network	SPH11
NBL Y10 Sinks	NBL1
NBL-RMX-SCICOURT	NBL2
NBL-2ND FLOOR\RMX	NBL3
NBL-ENG/SSC	NBL4
NBL-RMW	NBL5
NBL-ENT	NBL6
Main Corridor Toilet	MBL1
Hall Stairs Tech Exit	MBL2
Hall Stairs Y9 Toilet	MBL3
6th Form Study Right.	MBL4
6th Form Study Left.	MBL5
Benches Right	MBL6
Bike Rack	MBL7
Courtyard-Carpark	MBL8
Main Hall	MBL9
Steps Left	MBL10
Carpark - Cenotaph	MBL11
Benches - Carpark	MBL12
Steps Right	MBL13
Left Dining Corridor	MBL14
Right Dining Corridor	MBL15
Site office	MBL16
RMI COR	MBL17
RM1-2 COR	MBL18
LIB - ART	MBL19
DINING / ENT	MBL20
RM N/O COR	MBL21
Dining Room Back	MBL22
MBL-Tennis Courts-Right	MBL23
MBL-Tennis Courts-Left	MBL24
MBL-Lib PCs	MBL25
MBL-Repro	MBL26
MBL-SSC-RmM	MBL27
MBL-6TH-PE-ENT	MBL28
MBL-ART	MBL29
Top Car Park Mound	3GP1
3G Pitch Back Right	3GP2

3G Running	3GP3
3G Pitch Back Left	3GP4
Stairs to 3G Pitch	3GP5
Pavilion	3GP6
TEC Maths Walkway	TEC1
TEC-T3-PRNT	TEC2
TEC-ENT	TEC3
TEC-WALKWAY	TEC4
6th Form Lower Entrance	6TH1
6th Form Printer	6TH2
MUS-ENT-INT	MUS1
MUS-Cor	MUS2
Art: Carpark	AR1
Art:6thEnt-MusStairs	AR2
Art: Back	AR3

Type of imagery

Our cameras record digital moving images and have ANPR (Automatic Number Plate Recognition) capability to further safeguard our staff, students and visitors.

Signage

Signs are positioned at the entrance to the School as required by the Code of Practice. These signs indicate that CCTV monitoring and recording are in use on the premises.

Recording of CCTV images

Recordings may be made from any of the CCTV cameras. These recordings include a date, time and system information overlay. Recording equipment and media will be housed in a place to which only administration and security staff have access. Recordings will be kept for 30 days, unless required as part of an ongoing investigation (or because the recording has been made over a holiday period), in which case recordings will be retained for as long as required for that investigation. At the end of 30 days the media will be recycled and the recordings will be erased by overwriting them with new recordings.

The CCTV system will operate 24 hours each day, every day of the year, recording all activity in the areas covered. Cameras will be used to monitor activities within the school to identify adverse activity actually occurring, anticipated or perceived, and for the purpose of securing the safety and wellbeing of the school's pupils and staff, together with its visitors. At no time will a camera be directed to follow or track an individual. Materials or knowledge secured as a result of CCTV use will not be used for any commercial or media purpose.

The management of the CCTV system will be overseen by the member of SLT with responsibility for the school premises. They are responsible for ensuring that the CCTV system is operated according to this policy and that regular audits are carried out to ensure that procedures are complied with. The day to day management and administration of the system is the responsibility of the Site Manager. The maintenance, security and support of the system is the responsibility of the Network Manager. The Network Manager is responsible for maintaining the recordings, ensuring their security and deleting them within the specified time period.

Viewing of CCTV images

Display equipment used to view the images from CCTV cameras will be located and positioned in such a way as only those responsible for security may ordinarily see the screen. Where display equipment is provided for controlled access security at a particular place such as a door entry point, display equipment will be located and positioned in such a way that only those likely to operate the system can view the image.

Recorded images may be viewed by members of the Senior Leadership Team or anybody delegated by them. With the exception of subject access requests under Data Protection Law (see below), only those who necessarily have to see the image for security and health and safety purposes may do so. Recorded images may be used to aid the identification of individuals for damage prevention or health and safety purposes.

Images can be viewed in the Site Manager's office and the Network Manager's office. Copies (electronic or paper) of images may be authorised by members of the Senior Leadership Team.

Authorised staff may only allow external persons or agencies to view CCTV images with the express permission of the Headteacher and by following the procedures below.

Requests by law enforcement agencies (most commonly the police) can be authorised by the school under the Data Protection Act 2018, Schedule 2, Part 1, Paragraph 2. A copy of images may be released to the agency on the understanding that the images remain the property of the school and the school may refuse permission for the agency to pass the images to any other person. Such requests should be made to the Headteacher.

Applications received from outside bodies (e.g. solicitors) to view or release footage will be referred to the Headteacher. In these circumstances, footage will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, or in response to a Court Order.

Requests may come from other external individuals and consideration would need to be given to how genuine or necessary the request is and whether there is any risk to the safety of others.

Subject Access Requests

The Data Protection Legislation allows individuals whose images have been recorded the right to view the images of themselves and to have a copy of the images. This is termed a Subject

Access Request. Requests of this nature should be made to the Headteacher who will make arrangements for the images to be provided within one month of the request if possible. The person making the request must give sufficient information to enable the images to be found. The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

It is important that the school does not compromise anyone else's privacy, so you will only be able to view CCTV footage that does not contain images of third parties or images that would enable you to identify other people. Images of other subjects would need to be edited or blanked out to make sure no one else can be identified.

This process is costly, and one which the school has the right to refuse to undertake if the costs are disproportionate. Alternatively, the costs may be passed onto the person who has made the request.

The Information Commissioner has published a separate CCTV Code of Practice detailing how to operate a system in accordance with Data Protection Legislation. Where necessary, the Headteacher or their representative will refer to this Information Commissioners Code of Practice (sections 5.2.2 & 5.2.3) for further guidance on disclosing images to law enforcement agencies or to individuals.

In all such cases where requests are made the school will keep a detailed log (register) of the nature of the request and the details/images provided. The Headteacher, or a senior leader acting on their behalf, will initially investigate any breach of this Policy by school staff. Any serious breach of this Policy will be subject to the terms of disciplinary procedures already in place.

The Headteacher or their representative may carry out performance monitoring, including random operating checks.

System maintenance

Display equipment and recordings may be viewed by personnel authorised to undertake installation and maintenance of the CCTV systems. Such viewing will be restricted to that necessary for system work.

Police cooperation

The School wishes to maintain good working relations with the police and will cooperate whenever it can do so within the law.

CCTV – Privacy Notice

Closed circuit television is installed and operated at the School for security and health and safety purposes. Images from the installed cameras may be viewed and recorded. This privacy notice explains what personal information is collected, what it is used for and who it is provided to. The notice also describes why we require your data, and the legal basis on which we do this. This privacy notice relates to our CCTV System, including, but not limited to, where it has been installed on the outside of some of our buildings. It provides additional information that specifically relates to this particular service, and should be read together with our general privacy notice. We are committed to carrying out a Data Protection Impact Assessment (DPIA) prior to any further installation or expansion of our CCTV across the school.

What personal information does this service use?

The CCTV system captures images of people and vehicles in and around where a camera is located.

Images captured by CCTV will not be kept for longer than 30 days, unless over a holiday period. However, on occasions there may be a need to keep images for longer, for example where an incident is being investigated.

What is your personal information used for?

We use your personal data for the following reasons:

- a) To increase personal safety of pupils, staff and visitors
- b) To protect the school buildings and their assets
- c) To assist the Police in identifying potential offenders
- d) To assist in managing the school

What is the lawful basis we are relying on?

We collect and use this information to ensure the school can undertake its remit to educate children ensuring personal safety of pupils, staff and visitors, protecting school buildings and its assets and to assist in managing the school (Article 6(1)(e) of the General Data Protection Regulation).