Heathland Whitefriars Federation

# CCTV Systems Policy

**For Approval by Directors: December 2021**

**Review Frequency: Every 2 years**

**Reviewed: November 2025**

**Next Review Due: November 2027**

## Introduction

The School recognises 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.

## Objectives

The purpose of the CCTV system is to assist the school in reaching these 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 the cause of accidents and other adverse incidents and prevent reoccurrence

(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 school. The CCTV system used by the school comprises of:

| **WHITEFRIARS** | | | | |
|---|---|---|---|---|
| **CAMERA TYPE Hikvision** | **LOCATION** | **SOUND** | **RECORDING CAPACITY** | **SWIVEL / FIXED** |
| DS-3E1326P-EI | Server Room | N | Y | F |
| DS-3E1326P-EI | Server Room | N | Y | F |
| DS-3E1326P-EI | Nursery Passage | N | Y | F |
| DS-3E1326P-EI | Nursery Passage | N | Y | F |
| DS-3E1326P-EI | Comms Room | N | Y | F |
| DS-9664NI-I8 | Server Room | N | Y | F |
| DS-9664NI-I8 | Server Room | N | Y | F |
| DS-2CD2386G2-IU | Pathway to Nursery Entrance | N | Y | F |
| DS-2CD2386G2-IU | Pathway to CC | N | Y | F |
| DS-2CD2386G2-IU | Basketball court | N | Y | F |
| DS-2CD2386G2-IU | Nursery Playground | N | Y | F |
| DS-2CD2146G2-ISU | 1F Corridor outside commo | N | Y | F |
| DS-2CD2146G2-ISU | Common Room 1 | N | Y | F |
| DS-2CD2386G2-IU | Sports Field 3 | N | Y | F |
| DS-2CD2145FWD-IS | 1st Flr Stairs 2 | N | Y | F |
| DS-2CD2386G2-IU | Top Playground - Y 5 & 6 | N | Y | F |
| DS-2CD2386G2-IU | Back car park 2 | N | Y | F |
| DS-2CD2386G2-IU | Exterior Side Corridor | N | Y | F |
| DS-2CD2386G2-IU | Entrance to CC | N | Y | F |

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|---|---|---|---|---|
| DS-2CD2386G2-IU | Playground outside dining | N | Y | F |
| DS-2CD2386G2-IU | Rear parking pedestrian ga | N | Y | F |
| DS-2CD2145FWD-IS | 1F Corridor by Stairs 5 | N | Y | F |
| DS-2CD2386G2-IU | Back car park 3 | N | Y | F |
| DS-2CD2386G2-IU | Back Car Park - Stairs 2 | N | Y | F |
| DS-2CD2386G2-IU | Playground 4 | N | Y | F |
| DS-2CD2386G2-IU | External Corridor 2 | N | Y | F |
| DS-2CD2145FWD-IS | GF Computing room 1 | N | Y | F |
| DS-2CD2146G2-ISU | Under canopy by dining ha | N | Y | F |
| DS-2CD2146G2-ISU | GF Lobby Stairs 4 | N | Y | F |
| DS-2CD2146G2-ISU | 1F Stairs 1 | N | Y | F |
| DS-2CD2146G2-ISU | Rear reception delivery gat | N | Y | F |
| DS-2CD2146G2-ISU | 1F Corridor outside HR | N | Y | F |
| DS-2CD2146G2-ISU | 1F Stairs 5 | N | Y | F |
| DS-2CD2146G2-ISU | GF Stairs 3 | N | Y | F |
| DS-2CD2146G2-ISU | Outside 1F Toilets | N | Y | F |
| DS-2CD2146G2-ISU | Main Reception | N | Y | F |
| DS-2CD2146G2-ISU | 1F Lobby by Lift | N | Y | F |
| DS-2CD2146G2-ISU | Sports Hall | N | Y | F |
| DS-2CD2146G2-ISU | 1F Corridor by English | N | Y | F |
| DS-2CD2146G2-ISU | Dining Hall Food Tech Door | N | Y | F |
| DS-2CD2146G2-ISU | GF Staircase 2 | N | Y | F |
| DS-2CD2146G2-ISU | 2F Stairs 1 | N | Y | F |
| DS-2CD2146G2-ISU | GF Corridor by Nursery | N | Y | F |
| DS-2CD2146G2-ISU | GF Stairs 1 Y 5 & 6 Corridor | N | Y | F |
| DS-2CD2146G2-ISU | Stairwell 5 | N | Y | F |
| DS-2CD2146G2-ISU | 2F Corridor outside plant r | N | Y | F |
| DS-2CD2146G2-ISU | 1F Corridor outside office | N | Y | F |
| DS-2CD2146G2-ISU | 1F Corridor outside interna | N | Y | F |
| DS-2CD2146G2-ISU | Common Room 2 | N | Y | F |
| DS-2CD2146G2-ISU | Back entrance foyer doors | N | Y | F |
| DS-2CD2146G2-ISU | GF Lobby by lift | N | Y | F |
| DS-2CD2146G2-ISU | 1F Corridor towards stairs | N | Y | F |
| DS-2CD2146G2-ISU | 2F Corridor outside ART & | N | Y | F |
| DS-2CD2146G2-ISU | 1F Stairs 4 | N | Y | F |
| DS-2CD2146G2-ISU | Science Corridor | N | Y | F |
| DS-2CD2146G2-ISU | Dance Studio 2 | N | Y | F |
| DS-2CD2146G2-ISU | GF Corridor behind reception | N | Y | F |
| DS-2CD2146G2-ISU | Back Reception | N | Y | F |
| DS-2CD2146G2-ISU | Stairs 5 | N | Y | F |
| DS-2CD2146G2-ISU | GF Corridor outside library | N | Y | F |
| DS-2CD2146G2-ISU | GF Computing room 2 | N | Y | F |
| DS-2CD2146G2-ISU | GF Toilets | N | Y | F |
| DS-2CD2146G2-ISU | 2F Stairs 5 | N | Y | F |

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| DS-2CD2146G2-ISU | GF Outside Site Office | N | Y | F |
| DS-2CD2146G2-ISU | 1F Corridor outside HT Office | N | Y | F |
| DS-2CD6D44G1H-IZS | Playground | N | Y | F |
| DS-2CD6D44G1H-IZS | Playground2 | N | Y | F |
| DS-2CD6D44G1H-IZS | Playground 3 | N | Y | F |
| DS-2CD6D44G1H-IZS | Sports Field 1 | N | Y | F |
| DS-2CD6D44G1H-IZS | Sports Field 2 | N | Y | F |
| DS-2CD6D44G1H-IZS | Sports Field 3 | N | Y | F |
| DS-2CD6D44G1H-IZS | Top Playground Y5 & 6 | N | Y | F |
| DS-2CD6D44G1H-IZS | Top Playground Y5 & -2 | N | Y | F |
| DS-2CD6D44G1H-IZS | Top Playground Y5 & 6 - 3 | N | Y | F |
| DS-2CD6D44G1H-IZS | Front Driveway & Gate | N | Y | F |
| DS-2CD6D44G1H-IZS | Primary Playground | N | Y | F |
| DS-2CD6D44G1H-IZS | Front Pathway to Reception | N | Y | F |
| DS-2CD6D44G1H-IZS | Tudor Rd 1 | N | Y | F |
| DS-2CD6D44G1H-IZS | Tudor Rd Vehicle Gate | N | Y | F |
| DS-2CD6D44G1H-IZS | Tudor Rd 2 | N | Y | F |
| DS-2CD6D44G1H-IZS | Tudor Rd 3 | N | Y | F |
| DS-2CD6D44G1H-IZS | Front Reception Pathway | N | Y | F |
| DS-2CD6D44G1H-IZS | Primary School Entrance | N | Y | F |
| DS-2CD6D44G1H-IZS | Playground by PS Entrance | N | Y | F |
| DS-2CD6D44G1H-IZS | Pedestrian Gate/CC View | N | Y | F |
| DS-2CD2146G2-ISU | 1st Flr IT Suite 1 | N | Y | F |
| DS-2CD2146G2-ISU | Dance Studio 1 | N | Y | F |
| DS-2CD2146G2-ISU | 1st Flr Roof Access | N | Y | F |
| DS-2CD2146G2-ISU | Dining Hall 1 | N | Y | F |
| DS-2CD2146G2-ISU | Y5&6 Toilets | N | Y | F |
| DS-2CD2146G2-ISU | Sunshine Room 1 | N | Y | F |
| DS-2CD2146G2-ISU | Exit to playground Stairs 3 | N | Y | F |
| DS-2CD2146G2-ISU | Sports Hall 2 | N | Y | F |
| DS-2CD2146G2-ISU | Y5&6 Corridor | N | Y | F |
| DS-2CD2146G2-ISU | Lobby by 6th Form lift | N | Y | F |
| DS-2CD2146G2-ISU | Stairs 1 | N | Y | F |
| DS-2CD2146G2-ISU | Corridor by CC Internal Do | N | Y | F |
| DS-2CD2146G2-ISU | 2nd flr Lobby Stairs 3 | N | Y | F |
| DS-2CD2146G2-ISU | 1st flr Outside Sunshine Ro | N | Y | F |
| DS-2CD2146G2-ISU | 2nd flr Corridor by ART & D | N | Y | F |
| DS-2CD2146G2-ISU | GF Lobby Stairs 2 | N | Y | F |
| DS-2CD2146G2-ISU | GF Lobby by Sports Hall | N | Y | F |
| DS-2CD2146G2-ISU | 1st flr Computing Room 2 | N | Y | F |
| DS-2CD2146G2-ISU | GF Toilets to delivery store | N | Y | F |
| DS-2CD2146G2-ISU | Dining Hall 2 | N | Y | F |
| DS-2CD2146G2-ISU | Main Hall | N | Y | F |
| DS-2CD2146G2-ISU | GF Corridor to activity stud | N | Y | F |

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|---|---|---|---|---|
| DS-2CD2146G2-ISU | GF Stairs 3 | N | Y | F |
| DS-2CD2146G2-ISU | Dining Hall 3 | N | Y | F |
| DS-2CD2146G2-ISU | Sunshine Room 2 | N | Y | F |
| DS-2CD2146G2-ISU | 2nd flr. Corridor by DT | N | Y | F |
| DS-2CD6D44G1H-IZS | Back Car Park at Stairs 2 | N | Y | F |
| DS-2CD2146G2-ISU | 1st flr. Computing room 2 | N | Y | F |
| DS-2CD6D44G1H-IZS | Back reception outside 1 | N | Y | F |
| DS-2CD2146G2-ISU | Back reception outside 2 | N | Y | F |
| DS-2CD6D44G1H-IZS | Front CC & Parking | N | Y | F |
| DS-2CD6D44G1H-IZS | Nursery Roof | N | Y | F |
| DS-2CD6D44G1H-IZS | Front Staff Parking | N | Y | F |
| DS-2CD2146G2-ISU | 1st flr. Computing 3 | N | Y | F |
| DS-2CD2146G2-ISU | 1st flr. Corridor by Meeting | N | Y | F |

| **Heathland** | | | | |
|---|---|---|---|---|
| **CAMERA TYPE** | **LOCATION** | **SOUND** | **RECORDING CAPACITY** | **SWIVEL / FIXED** |
| | **Ground floor** | | | |
| Hikvision | Hard drive office store room | N | Y | N/A |
| Hikvision | Hard drive office store room | N | Y | N/A |
| Hikvision | Reception playground | N | Y | F |
| Hikvision | Main entrance external | N | Y | F |
| Hikvision | Main entrance external P/ Gate | N | Y | F |
| Hikvision | Main entrance external carpark | N | Y | F |
| Hikvision | Lobby main entrance internal | N | Y | F |
| Hikvision | KS1 playground external | N | Y | F |
| Hikvision | KS1 playground external | N | Y | F |
| Hikvision | Over staff room external | N | Y | F |
| Hikvision | Over staff room external | N | Y | F |
| Hikvision | Over staff room external | N | Y | F |
| Hikvision | KS2 playground external | N | Y | F |
| Hikvision | KS2 playground external | N | Y | F |
| Hikvision | Year 6 toilet corridor | N | Y | F |
| Hikvision | Year2 corridor internal | N | Y | F |
| Hikvision | Year 1 corridor internal | N | Y | F |
| | **Mezzanine floor** | | | |
| Hikvision | Elder Room internal | N | Y | F |
| Hikvision | **First floor** | | | |
| Hikvision | Year 5 corridor | N | Y | F |
| Hikvision | Year 3 corridor | N | Y | F |

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. 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 case of a compelling need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for as long as is necessary.

**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 the Head of Operations at Whitefriars School and the Operations and HR Manager at Heathland School who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy.

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 operation 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 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 Network Manager is responsible for arranging 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 the Headteacher, requests access to the CCTV data or system, the System Manager must satisfy himself 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 log book including time/date 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: -

Each downloaded media must be identified by a unique mark.

a) Before use, each downloaded media must be cleaned of any previous recording.

b) The System Manager will register the date and time of downloaded media insertion, including its reference.

c) 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.

d) If downloaded media is archived, the reference must be noted.

e) 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 Headteacher 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 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.

**Request 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 to the Head of Operations at Whitefriars School and the Operations and HR Manager at Heathland 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 complaints policy available on the school website.

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 Head of Operations at Whitefriars School and the Operations and HR Manager at Heathland School. 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 on the School Website.