



CCTV Policy

1. PURPOSE

The Purpose of this policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at Meadowfield School, hereafter referred to as 'the School'.

CCTV systems are installed both internally and externally in Swanstree Avenue Site and Ufton Lane site for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external environs of the premises during both the daylight and night hours each day. CCTV surveillance at the School is intended for the purposes of:

- protecting the School buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, pupils and visitors;
- preventing bullying and supporting safeguarding;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders.

The system does not have sound recording capability.

The CCTV system is owned and operated by the School, the deployment of which is determined by the School's leadership team.

The introduction of, or changes to, CCTV monitoring might be subject to consultation with staff and members of the School community depending on the result of the Data Protection Impact Assessment carried out by the School and verified by the appointed Data Protection Officer.

The School's CCTV is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR).

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are made aware of their responsibilities in following the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of recorded images.

2. SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. The School complies with the Information Commissioner's Office (ICO) <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf> CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use.

CCTV warning signs will be clearly and prominently placed at the main external entrance to the School. Signs will contain details of the purpose for using CCTV, Appendix 1. In areas where CCTV is used, the School will ensure that there are prominent signs placed within the controlled area.

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

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the School, including Equality & Diversity Policy, Codes of Practice for dealing with Complaints, including the provisions set down in equality and other educational and related legislation.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the School or a student attending the School.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the School. Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulation and Data Protection Act 2018.

3. LOCATION OF CAMERAS

The cameras are sited so that they only capture images relevant to the purposes for which they have been installed (as described above), and care will be taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered to ensure that the images captured comply with the legislation, Appendix 2.

The School will make every effort to position the cameras so that their coverage is restricted to the School premises, which includes both indoor and outdoor areas. The school currently has 14 cameras at the main Swanstree site, 16 cameras in the new teaching block on the main Swanstree site and 12 cameras at Ufton Lane site.

CCTV will not be used in classrooms but in limited areas within the School that have been identified by staff and pupils as not being easily monitored.

Members of staff will have access to details of where CCTV cameras are situated.

CCTV Video Monitoring and Recording of Public Areas may include the following:

- Protection of school buildings and property: The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, receiving areas for goods/services
- Monitoring of Access Control Systems: Monitor and record restricted access areas at entrances to buildings and other areas
- Verification of Security Alarms: Intrusion alarms, exit door controls, external alarms
- Video Patrol of Public Areas: Parking areas, Main entrance/exit gates, Traffic Control
- Criminal Investigations (carried out by the police): Robbery, burglary and theft surveillance

4. STORAGE AND RETENTION OF CCTV IMAGES

Recorded data will not be retained for longer than 31 days except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

Where data is retained for longer than 31 days an electronic file held on a secure central server where specific CCTV image/recordings are retained will be kept. The Data Protection Act and GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention will reflect the School's purposes for recording information, and how long it is needed to achieve this purpose.

The School will store data securely at all times. Images are stored on a hard drive located in the new Sports Hall on the main site and in the Reception Office at Ufton Lane.

5. ACCESS TO CCTV IMAGES

Access to recorded images will be restricted to the staff authorised to view them, with the written permission of the Principal and will not be made widely available. Supervising the access and maintenance of the CCTV System is the responsibility of the Principal. The Principal may delegate the administration of the CCTV System to another staff member. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis. See Appendix 4 - CCTV Viewing Log.

6. SUBJECT ACCESS REQUESTS (SAR)

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the UK GDPR.

All requests should be made in writing to the Principal, who can be contacted by email office@meadowfield.kent.sch.uk Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location. See Appendix 3 for CCTV Data Access Request form.

The School does not have a facility to provide copies of CCTV footage but instead the applicant may view the CCTV footage if available.

The School will respond to requests within 30 days of receiving the request but if a request is received outside of the School term this may not be possible.

The School reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

7. ACCESS AND DISCLOSURE OF IMAGES TO THIRD PARTIES

There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police and service providers to the School where these would reasonably need access to the data (e.g. investigators).

If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However, very careful consideration must be given to exactly what the Court Order requires. If there are any concerns as to disclosure, then the DPO should be contacted in the first instance and appropriate legal advice may be required.

Requests for images should be made in writing to the Principal.

The data may be used within the School's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

8. RESPONSIBILITIES

The Director of Finance & Business Services and Facilities Manager will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the School.
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy. Ensure that the CCTV monitoring is consistent with the highest standards and protections.
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy under the express permission of the Principal..
- Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system.
- Ensure that monitoring recorded tapes are not duplicated for release.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally.
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the School and be mindful that no such infringement is likely to take place.
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 31 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Principal.
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy.

- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.

9. OPERATION & MAINTENANCE

The system will be in operation 24 hours a day, every day of the year.

The Facilities Manager will check or arrange for the checking and confirm that the system is properly recording and that cameras are functioning correctly.

The system will be formally checked and to the extent necessary serviced no less than annually. The School has a contract with ADT for maintenance purposes.

The IT Manager will assist the Facilities Manager with technical support and network connectivity.

10. DATA PROTECTION IMPACT ASSESSMENTS AND PRIVACY BY DESIGN

CCTV has the potential to be privacy intrusive. The School will perform a Data Protection Impact Assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and address a pressing need identified.

11. COMPLAINTS & QUERIES

Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, should be referred to the Principal in the first instance in compliance with the School's Complaints Policy.

The Complaints Policy is accessible on the School's website or a paper copy is available from the School Office.

12. POLICY REVIEW


The Director of Finance & Business Services and Facilities Manager are responsible for monitoring and reviewing this policy. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

13. LINKS WITH OTHER POLICIES

This CCTV policy is linked to the School:

- Data Protection Policy
- Freedom of Information Policy
- Information Sharing Agreement
- Data Protection Impact Assessment
- Acceptable Use Policy
- Safeguarding Policy
- GDPR Privacy Notices

The ICO also provides a free helpdesk that can be used by anyone and a website containing a large range of resources and guidance on all aspects of Information Law for use by organisations and the public. See www.ico.org.uk

 School Policy Approved by Leadership	
Policy Adopted	Date: February 2024
Policy Approved	Date: 23 February 2024
Next Review:	Academic Year 2025/26

APPENDIX 1 - CCTV SIGNAGE

It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The School is to ensure that this requirement is fulfilled. The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded.
- The purposes of using CCTV.
- The name of the School.
- The contact telephone number or address for enquiries.

Example Sign:



WARNING

CCTV cameras in operation

Images are being monitored and recorded for the purpose of crime-prevention, the prevention of anti-social behaviour, the prevention of bullying, for the safety of our staff and students and for the protection of the School and its property.

This system will be in operation 24 hours a day, every day.

These images may be passed to the police. This scheme is controlled by the School for more information contact the School Office, tel.01795 477788 or email: office@meadowfield.kent.sch.uk

APPENDIX 2 - CAMERA LOCATIONS

Main Site – Swanstree Avenue	
Camera Number	Location
1	Reception
2	Reception
3	Middle Main corridor
4	Mini Bus Bay
5	Outside Reception covering front building
6	Outside Reception covering front of building
7	Exit Gates and Car Park
8	Exit Gates and Car Park
9	Entrance Gate and Car Park
10	Entrance Gate and Car Park
11	Above Site Team Entrance
12	Between Old and New Building
13	Between Key 2 and Key 3
14	Between Key 1 and Science block
New Building, Main Site – Swanstree Avenue	
1	Outside the building facing Entrance
2	Outside the building facing Playground
3	Outside the building facing Playground
4	Outside the building walkway between the new buildings
5	Outside the building walkway between the new buildings
6	Outside the building facing car park
7	In CCTV Room
8	Corridor Sports Hall
9	Corridor
10	Corridor
11	Corridor
12	Corridor
13	Corridor
14	Corridor
15	Corridor
16	Corridor
Ufton Lane	
1	Front Forecourt - parking area - (view across front of building towards car park gate area)
2	Main School Entrance Doors (view from front corner of building by Atlantis class back towards the building)
3	Playground - Ramp - facing towards the back of playground
4	Playground - Ramp - facing towards side gate at front of school Car Park back view
5	Car Park - facing back door into staff room
6	Car Park - facing across from building to rear corner (bin compound area)
7	Car Park - facing fire door (Apollo Class)
8	Playground - view from behind Apollo Class across the main playground to its far-right back corner
9	Playground - view from far right of building, back across the rear part of main playground (behind the building) towards fence and staff car park
10	Reception Office
11	Lobby area
12	Main School Hall

APPENDIX 3 - CCTV Data 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 31 days.

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)	
Reason for request:	

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.

APPENDIX 4 - CCTV Viewing Log **Permission is required from the Principal to view ALL CCTV**

Camera Number	Date	Time	Viewed By	Date Viewed image	Time of Viewed image	Length of Viewed Image	Reason	Recorded Y/N with location	Crime number if applicable