



**Central Region  
Schools Trust**

*Founded by the RSA*

## **SURVEILLANCE AND CCTV POLICY**

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**Recommended by:**

**Head of IT and Data**

**Ratified by:**

**Audit and Risk Committee**

A handwritten signature in dark ink, appearing to read 'John Howard', is displayed on a light blue rectangular background.

**Signed:**

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Chair of Audit and Risk  
Committee

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**Position on the Board:**

**Ratification Date**

**09.04.2025**

**Next Review:**

Spring Term 2027

**Policy Tier (Central/Hub/School):**

Central

|            |                            |
|------------|----------------------------|
| Throughout | No changes in this edition |
|------------|----------------------------|

## 1. Statement of Intent

Central Region Schools Trust is committed to providing a safe and secure environment for all students, staff, and visitors across its network of schools. This Surveillance and CCTV Policy outlines the principles and procedures governing the use of surveillance and closed-circuit television (CCTV) systems within the trust's premises. The trust recognises the importance of balancing security needs with individual privacy rights and aims to ensure that CCTV systems are used responsibly and in compliance with relevant laws and regulations.

## 2. Objectives

The objectives of the surveillance and CCTV systems within Central Region Schools Trust are as follows:

- To enhance the safety and security of students, staff, and visitors within trust premises.
- To deter and prevent criminal activities, including vandalism, theft, and unauthorised access.
- To provide evidence for investigating incidents.
- To ensure compliance with data protection laws and regulations, including the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

## 3. Purpose

Central Region Schools Trust and our schools will only use surveillance cameras for the safety and security of the school, and its staff, students and visitors. Surveillance will be used as a deterrent for violent behaviour and damage to the school.

This policy is designed to regulate the management, operation, and use of surveillance and CCTV systems across all schools within Central Region Schools Trust. It aims to ensure that:

- CCTV systems are used solely for the purposes outlined in this policy, including security monitoring and incident investigation.
- The privacy rights of individuals are respected, and CCTV footage is handled in accordance with data protection legislation.
- Staff are trained and aware of their responsibilities regarding the operation and maintenance of CCTV systems.
- Any concerns or complaints regarding CCTV usage are addressed promptly and effectively.

The surveillance system is a closed digital system. The surveillance system has been designed for maximum effectiveness and efficiency; however, the school cannot guarantee that every incident will be detected or covered, and blind spots may exist.

The surveillance system will not be used to focus on a particular group or individual unless an immediate response to an incident is required.

## 4. Video Conferencing

The use of any video conferencing technology within Central Region Schools Trust will adhere to principles of fairness and transparency. Prior to participation, users involved in any video conference calls will be informed of its purpose and notified when recordings are taking place. Additionally, explicit consent for the recording and potential publication of any video content to an indefinite audience will be obtained. Such recordings will adhere to the intended purpose and not be utilised beyond the scope of the initial consent.

## 5. Data Protection

Data collected from surveillance and CCTV will be:

- Processed lawfully, as determined by a Data Protection Impact Assessment (DPIA), or from advice from the Data Protection Officer (DPO). In less common circumstances, lawful processing will be determined by a legitimate interest assessment (LIA).
- Processed fairly, in a manner that people would reasonably expect.
- Processed in a transparent manner, ensuring people are informed data is being collected.
- Collected for specified and legitimate purposes – data will not be processed further in a manner that is incompatible with the following purposes:
  - Further processing for archiving data in the public interest
  - Scientific or historical research
  - Statistical purposes
- Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date; every reasonable step will be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, is erased or rectified without delay.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

Where the school or trust identify a high risk to an individual's interests, and it cannot be overcome, the school will consult the Information Commissioners Office (ICO) before they use CCTV, and the school or Trust will act on the ICO's advice.

The school will ensure that the installation of the surveillance and CCTV systems will always justify its means. If the use of a surveillance and CCTV system is too privacy intrusive, the school will seek amendments.

## 6. Legal Framework

This policy operates within the legal framework established by the following legislation and guidance:

- 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
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- School Standards and Framework Act 1998
- Children Act 1989
- Children Act 2004
- Equality Act 2010

Additionally, this policy aligns with the following statutory and non-statutory guidance:

- Home Office (2021) 'The Surveillance Camera Code of Practice'
- ICO (2021) 'Guide to the UK General Data Protection Regulation (UK GDPR)'
- ICO (2017) 'In the picture: A data protection code of practice for surveillance cameras and personal information'
- ICO (2022) 'Video Surveillance'

- DfE (2022) 'Protection of biometric data of children in schools and colleges'

## 7. Location of Cameras

CCTV cameras within Central Region Schools Trust are strategically located to cover key areas for security and safety purposes. These locations include but are not limited to entrances, exits, corridors, and outdoor spaces. The placement of cameras is determined based on security needs and considerations of privacy.

All CCTV cameras are clearly signposted to inform individuals of their presence and purpose. Signs are placed at main entrances and other relevant locations to ensure visibility and awareness among staff, students, and visitors.

## 8. Roles and Responsibilities

The following roles and responsibilities are established to ensure the effective management and operation of CCTV systems within Central Region Schools Trust:

- **Board of Trustees/Governing Body:** Overseeing the implementation and compliance of the CCTV policy, approving policy updates, and reviewing reports on CCTV usage periodically.
- **Principals / Heads of School:** Ensuring effective communication and implementation of the CCTV policy across school/s, providing resources and support for maintenance, and ensuring staff training.
- **Data Protection Officer (DPO) / Data Team:** Providing guidance on data protection laws, ensuring compliance with GDPR and other legislation, and handling data protection queries and complaints.
- **Estates Team:** Overseeing the installation, maintenance, and repair of CCTV systems at individual sites, monitoring performance, and coordinating technical support.
- **IT Services Team:** Operating and monitoring CCTV cameras, ensuring secure storage and access to footage, and responding to incidents or requests for footage.
- **Staff and Visitors:** Being aware of CCTV cameras, complying with signage and notices, and reporting concerns or incidents as necessary.
- **Data Subjects (Students, Staff, and Visitors):** Understanding rights regarding personal data processing, exercising rights under data protection laws, and reporting concerns or complaints to the DPO.

## 9. Security

Access to CCTV systems and recorded data is restricted to authorised personnel and protected by secure passwords and encryption where available and appropriate. In cases where large amounts of information need to be collected and retained, the school will likely use cloud storage and ensure this is secure and only accessible to authorised individuals.

Live access to CCTV footage is sometimes granted for external cameras to facilitate routine monitoring, such as managing visitor access through perimeter gates. However, accessing live footage from internal cameras is limited for exceptional circumstances, such as supporting a lockdown procedure, searching for missing individuals, or addressing vital security or safeguarding concerns.

## 10. Storage and Retention of CCTV Images

Our school's CCTV systems store data in video format (and audio format where applicable). CCTV footage captured by Central Region Schools Trust is subject to retention as outlined in our records management policy, ensuring compliance with the Data Protection Act (DPA) and the General Data Protection Regulation (GDPR). Retention periods are determined based on factors such as the system's

purpose, legal requirements, operational needs, and privacy considerations. We conduct regular reviews and updates to maintain compliance with relevant laws and regulations.

Once CCTV footage is no longer necessary for its intended purpose, it will be securely deleted or anonymised to protect individuals' privacy rights.

## **11. Monitoring and Review**

This policy will be subject to periodic review to ensure its effectiveness and compliance with relevant laws and regulations. Reviews will be conducted annually by the Chief Operations Officer (COO) in consultation with IT, Data and Estates functions. Any changes in legislation or guidance may trigger interim reviews as necessary.

## **12. Appendices**

### **A. Example Signage**

**Appendix A – Example Signage**

The following signage examples are provided as a visual guide to inform individuals of the presence of CCTV cameras and their purpose within across our premises. These signs are strategically placed at main entrances and other relevant locations to ensure visibility and awareness among staff, students, and visitors. Adherence to these signage guidelines is essential to comply with data protection regulations and to respect the privacy rights of individuals.

