



THE
Lodge AP
— At Sandbach House —

CCTV Policy

Policy Written/Reviewed by	Dave Evans
Date of Review	May 2025
Date of Next Review	May 2026

1. Introduction

- 1.1 The Lodge AP uses closed circuit television (CCTV) images to enhance safeguarding and monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.
- 1.2 The system comprises cameras both internally and externally
- 1.3 The system does have sound recording capability.
- 1.4 The CCTV system is owned and operated by the school, and its deployment is determined by the school's management team.
- 1.5 The CCTV display is protected behind a login on designated computers where the Facility Manager can monitor access and egress from the school site. Access to other recorded images is restricted to the Headteacher, Deputy Headteacher, the operational Safeguarding Lead and the Network Manager.
- 1.6 Any changes to CCTV monitoring will be subject to consultation with staff and the school governors.
- 1.7 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 1998. This policy outlines the school's use of CCTV and how it complies with the Act.
- 1.8 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 trained by the Facility Manager in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

2. Statement of Intent

- 2.1 The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:
<https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>
- 2.2 CCTV warning signs will be clearly and prominently displayed where CCTV cameras are deployed in and around the school site. Signs will contain details of the purpose for using CCTV.
- 2.3 The planning and design has endeavoured to ensure that the Scheme 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.

3. Siting the Cameras

- 3.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed (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 images captured comply with the Data Protection Act.
- 3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include indoor and outdoor areas.
- 3.3 Members of School Management Team should have access to details of where CCTV cameras are situated. The exception stated in the Code of Practice is if cameras are placed for the purpose of covert monitoring (see below).

4. Covert Monitoring

- 4.1 The school may in exceptional circumstances set up covert monitoring. For example:
 - i) Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
 - ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- 4.2 In these circumstances authorisation must be obtained from the Headteacher or Deputy Headteacher.
- 4.3 Covert monitoring must cease following completion of an investigation.
- 4.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilets.

5. Storage and Retention of CCTV Images

- 5.1 Recorded data will not be retained for longer than is necessary, (up to a maximum of 30 days). While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.
- 5.2 All retained data will be stored securely on the network with restricted access.
- 5.3 In exceptional circumstances recorded data may be held for longer than 30 days, for example if required as part of a safeguarding investigation, disciplinary or police matter for example.

6. Access to CCTV Images

- 6.1 Access to recorded images will be restricted to those staff authorised to view them (see 1.5), and will not be made more widely available.
- 6.2 A record book will be kept by the Facility Manager, recording any incidents or searches. This register will include the following:-
 - the purpose of any searches and whether the search was successful or not
 - who carried out search
 - persons present (particularly when reviewing).
 - date, start and end time of the incident.
 - date and time of the review
 - any other relevant information

7. Subject Access Requests (SAR)

- 7.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- 7.2 All requests should be made in writing to the Headteacher. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
- 7.3 The school will respond to requests within 30 calendar days of receiving the written request.
- 7.4 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.

8. Access to and Disclosure of Images to Third Parties

- 8.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).
- 8.2 Requests should be made in writing to the Headteacher.
- 8.3 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.

9. Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.

Further Information

Further information on CCTV and its use is available from the following:

CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)

- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2000 Data Protection Act 1998