



**Federation of  
Westminster Special Schools  
& Bi-Borough Inclusion Service**

# **FEDERATION CCTV POLICY**

**APPROVED BY GOVERNING BOARD LEADERSHIP GROUP: February 2024  
TO BE REVIEWED: February 2026**

## **1. Introduction**

- 1.1 Federation premises at QEII Jubilee School and College Park School use closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for children and young people, staff and visitors, and to prevent the loss or damage to Federation property.
- 1.2 The system comprises 25 fixed cameras both internally and externally to provide coverage of the gates, and outside the schools
- 1.3 The system has limited sound recording capability.
- 1.4 The CCTV system is owned and operated by the schools, and its deployment is determined by each school's Leadership Team.
- 1.5 The CCTV display monitor is held in the Site Manager office at each school site and monitors access and egress from the school sites. Access to other recorded images is restricted to the Headteacher, Federation Business Manager and Office staff and may be set as an application on those staff's phones.
- 1.6 Any changes to CCTV monitoring will be subject to consultation with staff and the Federation Governing Board.
- 1.7 Each school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 2018. 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 Federation Business Manager/Site 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 Each 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:

[http://www.ico.gov.uk/~media/documents/library/Data\\_Protection/Detailed\\_specialist\\_guides/ICO\\_CCTVFINAL\\_2301.ashx](http://www.ico.gov.uk/~media/documents/library/Data_Protection/Detailed_specialist_guides/ICO_CCTVFINAL_2301.ashx)

- 2.2 CCTV warning signs will be clearly and prominently displayed where CCTV cameras are deployed in and around the school sites. 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 Schools 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 CCTV will not be used in classrooms.

3.4 Members of staff 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 Senior Leadership Team.

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.

### **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 will be kept by the Federation Business Manager/Site 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 eg: date, time and location. The Federation Business Manager will process the request.

7.3 The school will respond to requests within 40 calendar days of receiving the written request.

7.4 The Federation must usually provide footage free of charge within one calendar month.

7.5 The schools reserve 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 schools where these would reasonably need access to the data (e.g. investigators).

8.2 Requests should be made in writing to the School 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**

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

### **Further Information on CCTV and its use is available from the following:**

- ✓ Amended Surveillance Camera Code of Practice 2022 (published by the Information Commissioners Office)
- ✓ [www.ico.gov.uk](http://www.ico.gov.uk)
- ✓ Regulation of Investigatory Powers Act (RIPA) 2000
- ✓ Data Protection Act 2018