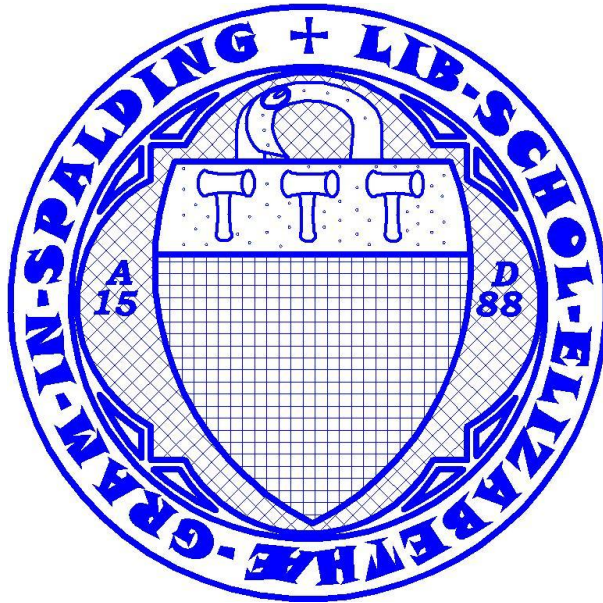


Spalding Grammar School



CCTV (Video Surveillance) Policy

Policy Owner: Executive Headteacher

Responsible Officer: Site Manager/Data Protection Officer

Review Frequency: Biennial

Last Reviewed: September 2026

Next Review: September 2028

Introduction

The Purpose of this policy is to regulate the management, operation and use of the School's CCTV (video surveillance) system in line with the Department for Education CCTV regulations (March 2026), the Information Commissioner's Office (ICO) Video surveillance (CCTV) guidance and associated UK GDPR requirements. It has been based on the National Education Union Model Policy for CCTV in schools and all credit is given to that document.

1. Policy Statement

Spalding Grammar School uses Closed-Circuit Television (CCTV) systems as part of its commitment to safeguarding pupils, staff and visitors, and maintaining a safe and secure environment.

The School ensures that the use of CCTV is:

- Lawful, fair and transparent
- Necessary and proportionate
- Regularly reviewed to ensure it remains justified

CCTV will not be used in a manner that is excessive or intrusive in relation to its intended purposes.

The CCTV system is owned and operated by the School, the deployment of which is determined by the School's Governing Body and Senior Leadership Team.

The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and members of the school community.

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 Policy. All employees are aware of the restrictions in relation to access to, and disclosure of recorded images.

2. Purpose of CCTV

The purposes of CCTV processing are to:

- Safeguard pupils, staff and visitors
- Protect school buildings and assets
- Prevent and detect crime, anti-social behaviour and damage
- Support health and safety arrangements
- Assist in incident investigations and law enforcement where appropriate

3. Legal Framework

CCTV images constitute personal data and are processed in accordance with:

- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)

The lawful basis for processing is:

- GDPR Article 6(1)(e) – Public Task, or
- GDPR Article 6(1)(f) – Legitimate Interests (where applicable)

The School acts as the Data Controller and complies with ICO guidance on video surveillance

Details of CCTV usage are included in the school's Privacy Notices, including purposes, lawful basis, retention periods, and individual rights. These notices are made available to pupils, parents/carers, staff and visitors.

4. Governance and Accountability

4.1 Governing Body

The Governing Body has overall accountability for ensuring that:

- The CCTV system complies with legislation and ICO guidance
- Its use is necessary, proportionate, and regularly reviewed
- Appropriate oversight is provided through the Safeguarding Governor

4.2 Executive Headteacher

The Executive Headteacher retains overall operational responsibility and will:

- Provide strategic oversight of the CCTV system
- Authorise access to footage in serious or sensitive cases
- Ensure CCTV is used lawfully, proportionately, and in line with safeguarding and behaviour policies
- Ensure regular review of necessity, including Data Protection Impact Assessments (DPIAs)

4.3 Business Manager

The Business Manager will:

- Oversee infrastructure, procurement, and resourcing of CCTV systems
- Ensure systems are maintained, secure, and fit for purpose
- Monitor contractual compliance with external providers
- Support compliance with retention and security requirements

4.4 Site Manager

The Site Manager is responsible for:

- Day-to-day operation of CCTV systems
- Ensuring cameras are functioning correctly and positioned appropriately
- Managing secure storage systems and access controls
- Logging access, faults, and maintenance actions

4.5 Data Protection Officer (DPO)

The DPO will:

- Advise on UK GDPR and Data Protection Act compliance
- Oversee Subject Access Requests (SARs) relating to CCTV
- Advise on DPIAs for new installations or changes
- Support decision-making where disclosure is sensitive or contested

4.6 Designated Safeguarding Lead (DSL)

The DSL will:

- Oversee use of CCTV footage in safeguarding matters
- Ensure footage is used appropriately in child protection concerns
- Liaise with external safeguarding partners where necessary
- Ensure decisions prioritise pupil welfare and statutory safeguarding duties

4.7 Authorised Staff

Authorised staff (e.g. SLT, pastoral leaders, pastoral support officers, safeguarding staff) must:

- Only access CCTV where necessary and proportionate
- Seek appropriate authorisation (usually SLT or DSL)
- Ensure use is consistent with safeguarding, behaviour, and conduct policies
- Complete regular data protection and safeguarding training

5. Scope and Use

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. The School follows the Information Commissioner's Office (ICO) Video surveillance (CCTV) guidance and associated UK GDPR requirements.

CCTV warning signs will be clearly and prominently placed at the main external entrance to the School.

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 and related legislation. 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.

CCTV will not be used for routine staff performance monitoring. It may be used in specific circumstances (e.g. safeguarding or misconduct investigations) where lawful, necessary and proportionate.

CCTV is not routinely used in classrooms. Any exception will require a documented DPIA demonstrating necessity and proportionality.

Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the Data Protection Act 2018 and the UK General Data Protection Regulation.

6. Location and Coverage

The cameras are sited so that they capture images relevant to the purposes for which they have been installed, 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. 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.

A Data Protection Impact Assessment (DPIA) will be carried out:

- before installing new CCTV systems
- when making significant changes to existing systems
- before introducing audio recording capabilities

DPIAs will assess:

- necessity and proportionality
- privacy risks
- mitigating controls

Members of staff will have access to details of where CCTV cameras are situated (Listed below):

Main system - internal

- Outside AGB office
- SFSC x 4 (computers upstairs only)
- Coffee shop x 2
- Atrium
- Business block F/F foyer
- Business block G/F foyer
- Sports Hall balcony
- Cadcam (computers in room)
- Brown door corridor
- Main Hall

- Sports Hall
- Room 3 (no computers in room)
- O/S T3
- O/S Centenary toilets
- Corridor O/S C1
- ICT foyer by photocopiers
- Back of Maths block
- Canteen
- Art block by double doors going to the shutter
- MFL block foyer (O/S room 11)
- English corridor x2 (view whole corridor)
- Maths foyer O/S room 7
- PE block foyer
- Library x2 (front desk and back corner)
- MFL block back stairs
- Ramp by Room 12
- Upper corridor from ramp double doors to Room 17
- Upper corridor O/S Room 17
- Upper corridor from MFL to top of English corridor
- Upper English corridor O/S Blake

Standalone internal system (monitored in ICT office)

- ICT 1 and 2

Standalone internal system (monitored in pastoral office)

- Internal inclusion room
- Top corridor O/S Safeguarding Office

Main system - External

- O/S Canteen looking towards St Thomas's Road gate
- O/S back of Maths (this has audio)
- PE front area
- Main Hall fire escape looking towards the tree
- O/S Art shutter (this has audio)
- Room 3 looking towards Haverfield Road gate
- Area O/S Room 7
- O/S grounds workshop
- Double doors opposite C1
- Portion of back playground
- Reception x 2 (door and carpark)

Standalone external system – monitored in old PaCE room/reception/Site Managers office

- Car park
- All gates

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, cashier locations, 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

7. Access to Recordings and Images.

Access is restricted to authorised personnel only and on a strict need-to-know basis.

Access to recorded images will be restricted to the staff authorised to view them and will not be made widely available.

A record will be kept of:

- all access to footage
- any disclosure of images

CCTV footage may be disclosed where lawful and necessary, including to:

- police or law enforcement
- safeguarding partners
- regulators
- insurers or legal representatives
- courts (where required)

All disclosures will be:

- documented
- proportionate
- compliant with data protection law

If an order is granted by a court for disclosure of CCTV images, the School will comply. However, very careful consideration will be given to exactly what the Court Order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

Requests for images should be made in writing to the Data Protection Officer.

8. Data Subject Rights

Individuals have rights under data protection law, including:

- the right of access (Subject Access Request)
- the right to erasure (where applicable)
- the right to restrict processing
- the right to object

Requests should be submitted to the Data Protection Officer.

The School will respond within one calendar month, subject to legal exemptions.

Requests may be refused or restricted where:

- it would affect the rights of others
- it would prejudice an investigation

Individuals have the right to raise concerns or complaints about the use of CCTV. Complaints should initially be addressed to the School via the school's Complaints Policy. If individuals remain dissatisfied, they have the right to complain to the Information Commissioner's Office (ICO).

9. Safeguarding Considerations

CCTV may be used as part of safeguarding investigations where necessary and proportionate.

The DSL will determine how footage is used in child protection cases.

Use of footage will always prioritise:

- The safety and welfare of pupils
- Compliance with KCSiE requirements

CCTV will not replace professional judgement or other safeguarding processes.

10. Storage, Retention and Security

CCTV footage is securely stored with:

- Restricted access controls
- Password protection
- Audit logs

Retention period:

- Up to 31 days
- Longer where required for investigations or legal proceedings

All staff with access receive regular data protection training.

11. Complaints

Complaints relating to CCTV use should be raised via the school Complaints Policy.

Individuals may also contact the Information Commissioner's Office (ICO) if dissatisfied.

12. Related Policies

- Behaviour Policy
- Data Protection Policy
- ICT Acceptable Use Policy

- Safeguarding and Child Protection Policy
- Staff Code of Conduct

13. Policy Review

This policy:

- Will be reviewed biennially
- May be reviewed earlier in response to legislative or guidance changes