

## CCTV (INCLUDING VIDEO ENTRY)

Policy applies to all persons on the School site	
Date of review:	13.01.2025
Date of next review:	04.01.2026
Version:	01.25 v1
Author:	Mr Michael Stewart

Version	Date	Paragraph	Material change	Approval
03.23 v1	06.03.2023	Appendix	Updated.	Mr Michael Stewart
01.24 v1	04.01.2024	7.2	Section updated.	Mr Michael Stewart
01.25 v1	13.01.2025	6 7.2 Appendix	Section updated to include potential cloud storage. Section updated to include record keeping. Location of new camera included.	Mr Michael Stewart

Clifton High School is committed to child protection and safeguarding children and young people and expects all staff, visitors, and volunteers to share this commitment.

### Related Policies

Data Protection  
Data Retention  
Filtering and Monitoring  
Premises  
Privacy Notices  
Security

### 1. Introduction

Clifton High School uses a CCTV system (the **System**) to view and record pupils, parents, staff, contractors and visitors on and around our premises. We recognise that the images of individuals recorded by the System are personal data which must be processed in accordance with data protection laws.



The System is administered and managed by the School, who act as the Data Controller. Although there are several related policies noted above, this policy should be read with reference to the School's Data Protection Policy and its Privacy Notices.

Data captured by the System will not be used for any commercial purpose.

## **2. Purpose of this policy**

The purpose of this policy is to:

- Outline why and how we will use CCTV, and how we will process personal data recorded by CCTV cameras;
- Ensure that the legal rights of our pupils, parents, staff and visitors relating to their personal data are recognised and respected; and
- Assist staff in complying with relevant legal obligations when working with personal data.

## **3. Objectives of the System**

The School's purposes for using CCTV are set out below and, having considered the privacy rights of individuals, the School believes that these purposes are all within its legitimate interests:

- To protect the personal safety of pupils, parents, staff, visitors, volunteers, and members of the public.
- To protect the School buildings, equipment and the personal property of pupils, staff, volunteers, visitors, and members of the public, and to assist the School in pursuing a claim for damage done to insured property.
- To monitor the security and integrity of the School site, including deliveries and arrivals.
- To support the police and other law enforcement bodies and the local community in preventing and detecting crime, and to assist in the detection and prosecution of offenders.
- To monitor and uphold discipline among pupils in line with the School's Behaviour policies.
- To assist in disciplinary and grievance proceedings and in civil litigation cases, including employment tribunal proceedings.

Please note that this list is not exhaustive and other purposes may become relevant from time to time.

## **4. Positioning**

All fixed cameras are in plain sight on the School premises. The School does not routinely use CCTV for covert monitoring and does not monitor private property outside the School grounds. The School's CCTV cameras are located at the locations listed in the Appendix and are reassessed routinely to ensure the number and coverage is proportionate.



Locations have been selected, both inside and outside, that the School reasonably believes require monitoring to address the stated objectives. The locations are set out in the Appendix. The School will ensure that adequate signage is placed in prominent positions to inform everyone that they are entering a monitored area, identifying the School as the Data Controller, and giving contact details for further information regarding the System.

No images will be captured from areas in which individuals would have a heightened expectation of privacy, including medical, changing and bathroom facilities. No images of public spaces will be captured except to a limited extent at site entrances.

## **5. Supervision**

We will ensure that recorded images are only viewed by approved members of staff whose roles require them to have access to such data. Staff authorised by the School to conduct routine supervision of the System may include Senior Leadership, the IT Department, supervisors of the Sports Centre and relevant staff on duty.

Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of, or opportunity for, access by unauthorised persons.

## **6. Storage of Data**

The day-to-day management of images will be the responsibility of the IT Manager, who will act as the System Manager, or such person as they shall appoint in their absence.

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered by CCTV cameras is stored in a way that maintains its integrity and security. Given the large amount of data generated by the CCTV system, we may store video footage using a cloud computing system. We will take all reasonable steps to ensure that any cloud service provider maintains the security of our information, in accordance with industry standards.

Images will be stored for two weeks, and automatically over-written, unless the School considers it reasonably necessary not to do so for the pursuit of the objectives of the System, or if lawfully required by an appropriate third party such as the police or local authority. Where such data is retained, it will be retained in accordance with the Clifton High School Data Retention Policy.

## **7. Access to Images**

### **7.1 Subject access requests**



Individuals have the right to request access to the personal data that the School holds on them (please see the School's Privacy Notices and Data Protection policy), including information held on the System, if it has been kept.

In order to respond to a subject access request, the School will require specific details including at least the time, date, and camera location before it can properly respond to any such requests. The School must also be satisfied as to the identity of the person wishing to view stored images and the legitimacy of their request.

This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

## **7.2 Disclosure of images to third parties**

No images from our CCTV cameras will be disclosed to a third party without express permission being given by the School. The following are examples where the School may authorise disclosure of CCTV images to third parties such as the police or local authority:

- Where required to do so by the police or any relevant local or statutory authority.
- To make a report regarding suspected criminal behaviour or a safeguarding incident.
- To enable the Designated Safeguarding Lead to examine behaviour which may give rise to a reasonable safeguarding concern.
- To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents will be informed as part of the School's management of a particular incident.
- To data subjects (or their legal representatives) pursuant to a subject access request under data protection legislation.
- To the School's insurance company where required to pursue a claim for damage done to insured property.
- In any other circumstances required under law or regulation.

Where images are disclosed, a record will be made in the system logbook including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).

The School reserves the right to obscure images of third parties when disclosing CCTV footage, where we consider it necessary to do so.

## **8. Other CCTV systems**

CCTV systems owned by third parties may capture images of pupils, parents, staff, contractors and visitors during School activities and the School is not responsible for their use and/or the images that they record. For example, some third-party coaches used as transport by the School



are equipped with CCTV. The School frequently uses premises belonging to third parties, such as sports facilities at Combe Dingle (owned by the University of Bristol) and an outdoor activity centre (owned by Mendip Outdoor Pursuits Ltd). In addition, educational visits will be undertaken to other third-party locations with CCTV systems in place.

Where permitted to do so, the School may use data captured by third party CCTV systems in establishing facts in cases of unacceptable pupil behaviour, in which case parents will be informed as part of the School's management of a particular issue.

### **9. Complaints and queries**

Any complaints or queries in relation to the School's CCTV System should be referred to the Finance Director. For any other queries concerning the use of your personal data by the School, please see the School's Privacy Notices.

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### Appendix:

List of current camera locations or area of coverage on School premises which are in operation:

Main Gate

Rear Gate<sup>1</sup>

Playground<sup>2</sup>

Mews Gate<sup>3</sup>

School Green	- CB3 (STEM Room)
School Green	- EB8 (Server Room)
School Green	- E22 (Year 11 Common Room)
School Green	- H11 (Computer classroom)
School Green	- H21 (Computer classroom)
School Green	- Gatehouse foyer

School House	- Main entrance
School House	- A21-a (Library)
School House	- A21-b (Library)
School House	- B24 (Wi-Fi Room)
School House	- Kitchen trade entrance

Sports Complex	- Main entrance
Sports Complex	- Swimming Pool

Sixth Form Centre	- Ground floor main entrance
Sixth Form Centre	- Ground floor hallway
Sixth Form Centre	- Ground floor quiet room toward lift and alternative entrance
Sixth Form Centre	- Lower Ground Floor Server Room
Sixth Form Centre	- External coving rear lower ground floor entrances
Sixth Form Centre	- Lower ground floor walkway to common room
Sixth Form Centre	- Common room ground floor, servery

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<sup>1</sup> Camera mounted on School House overlooking Clifton Park Road.

<sup>2</sup> Camera mounted on School Green, overlooking driveway, MUGA, hard surface play area, artificial grass (partial) towards Glenday Building and Rose Theatre.

<sup>3</sup> Camera mounted on Sixth Form Common Room overlooking mews gates.