CCTV Policy

THE GRANGE SCHOOL

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THE GRANGE SCHOOL

REVIEW DATES AND APPROVAL

This policy is reviewed and approved by the Head of The Grange School and Senior Leadership Team.

Last reviewed: Autumn Term 2026

Next review: Autumn Term 2027

Persons responsible for review: Chief Operating Officer

1 Policy Statement

1.1 The Grange School uses Close Circuit Television ("CCTV") within the premises of The Grange School. The purpose of this policy is to set out the position of The Grange School as to the management, operation and use of the CCTV at The Grange School.

1.2 This policy applies to all members of our Workforce, visitors to The Grange School premises and all other persons whose images may be captured by the CCTV system.

1.3 This policy takes account of all applicable legislation and guidance, including:

1.3.1 General Data Protection Regulation ("GDPR")

1.3.2 *Data Protection Act 2018* (together the Data Protection Legislation)

1.3.3 CCTV Code of Practice produced by the Information Commissioner

1.3.4 Human Rights Act 1998

1.4 This policy sets out the position of The Grange School in relation to its use of CCTV.

2 Purpose of CCTV

2.1 The Grange School uses CCTV for the following purposes:

2.1.1 To provide a safe and secure environment for pupils, staff and visitors

2.1.2 To prevent the loss of or damage to The Grange School buildings and/or assets

2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

2.1.4 To assist in managing the school

3 Description of system

3.1 The Grange School has multiple CCTV servers which hold camera footage. This provides resiliency of the system and prevents any tampering or overriding of the system.

3.2 The CCTV Servers are held in secure staff only areas where access is restricted.

3.3 The Grange School uses the very latest High Definition (HD) cameras with Infrared technology (IR) to allow adequate recording throughout the day and night.

3.4 Cameras are fixed units with the ability to have mask zones that prevent recording of any undesired area of the screen.

3.5 Cameras do not harness sound recording capabilities.

4 Siting of Cameras

4.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.

4.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The Grange School will make all reasonable efforts to ensure that areas outside of The Grange School premises are not recorded.

4.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.

4.4 Cameras will not be sited in areas where individual have a heightened expectation of privacy, such as changing rooms or toilets.

5 Privacy Impact Assessment

5.1 Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by The Grange School to ensure that the proposed installation is compliant with legislation and ICO guidance.

5.2 The Grange School will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

6 Management and Access

6.1 The CCTV system will be managed by Head of Estates and the Chief Operating Officer

6.2 On a day to day basis the CCTV system will be operated by Head of Estates & Estates Staff.

6.3 The viewing of live CCTV images will be restricted to authorised staff only.

6.4 Recorded images which are stored by the CCTV system will be restricted to access by authorised individuals only e.g. Head of Estates, Estates staff, Senior Leadership Teams and Chief Operating Officer

6.5 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.

6.6 The CCTV system is checked weekly by Head of Estates to ensure that it is operating effectively

7 Storage and Retention of Images

7.1 Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

7.2 Recorded images are stored only for a period of 60 days unless there is a specific purpose for which they are retained for a longer period. This extended period allows coverage over Summer Holidays when theft may only be realised upon return of Teaching Staff in September.

7.3 The Grange School will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

7.3.1 CCTV recording systems being located in restricted access areas;

7.3.2 The CCTV system being encrypted/password protected;

7.3.3 Restriction of the ability to make copies to specified members of staff

7.3.4 Any footage exported to USB disk must be identified by a unique mark and clear of any previous recordings.

7.4 A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by The Grange School.

8 Disclosure of Images to Data Subjects

8.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.

8.2 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of The Grange School Subject Access Request Policy.

8.3 When such a request is made Head of Estates or Chief Operating Officer will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

8.4 If the footage contains only the individual making the request, then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. Head of Estates and the Chief Operating Officer must take appropriate measures to ensure that the footage is restricted in this way.

8.5 If the footage contains images of other individuals, then The Grange School must consider whether:

8.5.1 The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;

8.5.2 The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or

8.5.3 If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

8.6 A record must be kept, and held securely, of all disclosures which sets out:

8.6.1 When the request was made;

8.6.2 The process followed by Head of Estates and Chief Operating Officer in determining whether the images contained third parties;

8.6.3 The considerations as to whether to allow access to those images;

8.6.4 The individuals that were permitted to view the images and when; and

8.6.5 Whether a copy of the images was provided, and if so to whom, when and in what format.

9 Disclosure of Images to Third Parties

9.1 The Grange School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

9.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

9.3 If a request is received form a law enforcement agency for disclosure of CCTV images then Head of Estates and Chief Operating Officer must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third-party images.

9.4 The information above must be recorded in relation to any disclosure.

9.5 If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However very careful consideration must 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.

10 Review of Policy and CCTV System

10.1 This policy will be reviewed as per the Next Review Date within this document index.

10.2 The CCTV system and the privacy impact assessment relating to it will be reviewed as per the Next Review Date within this document index.

11 Misuse of CCTV systems

11.1 The misuse of CCTV system could constitute a criminal offence.

11.2 Any member of staff who breaches this policy may be subject to disciplinary action.

12 Complaints relating to this policy

12.1 Any complaints relating to this policy or to the CCTV system operated by The Grange School should be made in accordance with The Grange School Complaints Policy