2 St. Paul's Rd, Cambridge CB1 2EZ
01223 471703
office.prep@sanctonwood.co.uk
www.sanctonwood.co.uk

CCTV Policy (September 2025)

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CCTV Policy

1. Introduction and Legal Framework

1.1 Purpose

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Sancton Wood School (the School). It serves as a notice and guide to data subjects (including pupils, parents, staff, volunteers, visitors to the School and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the System).

1.2 Legal Compliance

This policy has been developed to ensure compliance with:

- UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018
- Human Rights Act 1998
- Education (Independent School Standards) Regulations 2014
- Keeping Children Safe in Education (current statutory guidance)
- Information Commissioner's Office (ICO) Code of Practice for Surveillance Cameras

1.3 ISI Standards Integration

This policy directly supports the School's compliance with Independent School Standards, particularly:

- **Part 3**: Welfare, health and safety of pupils - safeguarding arrangements

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- **Part 8**: Quality of leadership and management - promoting pupil wellbeing
- Our duty of care and responsibility to actively promote pupil welfare and safety

1.4 Data Protection Registration

The School is registered with the Information Commissioner's Office (ICO) as a data controller (Registration Number: [Insert Number]) and pays the annual data protection fee. This registration covers our use of CCTV surveillance systems.

1.5 Data Protection Impact Assessment

A comprehensive Data Protection Impact Assessment (DPIA) has been conducted and is reviewed annually to ensure our CCTV system meets the necessity and proportionality requirements under UK GDPR. This assessment is available upon request from the School's Data Protection Officer.

2. Lawful Basis and Objectives

2.1 Lawful Basis for Processing

The School processes personal data through CCTV under Article 6(1)(f) of the UK GDPR - legitimate interests. We have conducted a legitimate interests assessment demonstrating that our use of CCTV is necessary for the purposes outlined below and that our legitimate interests are not overridden by the rights and freedoms of data subjects.

2.2 Objectives of the System

The School operates CCTV systems for the following specific purposes:

Primary Safeguarding Purposes:

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety and welfare
- To support safeguarding arrangements and child protection procedures
- To monitor and ensure the security and integrity of the School site, including during out-of-hours periods

Secondary Security Purposes:

- To protect the School buildings, equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public
- To support the police and relevant authorities in preventing and detecting crime and assist in the identification and apprehension of offenders
- To monitor deliveries, arrivals, and site access points

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- To monitor staff and contractors when carrying out work duties where necessary for safety purposes

Behavioural Management:

- To monitor and uphold discipline among pupils in line with the School's behaviour policy, supporting the creation of a safe learning environment
- To provide evidence in cases of alleged misconduct or disputes

Data captured for these purposes will not be used for any commercial purpose or routine performance management of staff.

3. System Specifications and Positioning

3.1 Camera Locations

Locations have been carefully selected based on necessity and proportionality assessments. Cameras are positioned in areas that require monitoring to address the stated objectives, including:

- Main entrances and exits
- Corridors and common areas
- Playground and outdoor areas
- Car parking areas (where applicable)
- Reception and administrative areas

3.2 Privacy Protection

Areas Excluded from Monitoring:

- No cameras are positioned in areas where individuals have a heightened expectation of privacy, including:
    - Changing rooms and washroom facilities
    - Private offices (unless specifically risk-assessed)
    - Staff rest areas
    - Medical/counselling rooms

Public Space Limitations:

- Images of public spaces beyond the School boundary are captured only to a limited extent at site entrances and only where necessary for security purposes

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3.3 Signage and Notification

- Adequate signage is placed in prominent positions to inform all persons that they are entering a monitored area
- Signs identify the School as the Data Controller and provide contact details for further information
- Signs meet ICO requirements and are clearly visible before entering monitored areas
- Digital and printed privacy notices contain information about CCTV usage

4. System Operation and Maintenance

4.1 Operational Hours

The CCTV System operates 24 hours a day, every day of the year, to ensure continuous security and safeguarding coverage.

4.2 System Management

System Manager Responsibilities: The day-to-day management of the CCTV system is the responsibility of Ganesh Ukkusuri, who acts as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence. The System Manager will:

- Check and confirm that the System is properly recording and cameras are functioning correctly on a regular basis
- Maintain the system log book
- Oversee access requests and disclosure decisions
- Ensure compliance with this policy and relevant legislation

4.3 Maintenance and Testing

- The System will be checked and (to the extent necessary) serviced no less than annually by qualified technicians
- Regular functionality checks will be conducted monthly
- Any technical issues will be reported and resolved promptly
- Backup systems and data recovery procedures are in place

5. Data Storage and Retention

5.1 Retention Period

CCTV images will be stored for **31 days** and automatically overwritten unless:

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- The School considers it reasonably necessary to retain the data for pursuit of the objectives outlined above
- The data is lawfully required by an appropriate third party such as the police, local authority, or other regulatory body
- The data relates to an ongoing investigation, safeguarding concern, or legal proceedings

5.2 Extended Retention

Where data is retained beyond the standard 31-day period:

- The decision will be documented with clear justification
- Data will be retained only for as long as necessary for the specific purpose
- Regular reviews will be conducted to ensure continued necessity
- Data will be securely deleted when no longer required

5.3 Storage Security

- All CCTV data is stored securely with appropriate technical and organisational measures
- Access controls ensure only authorized personnel can view stored data
- Data is encrypted both in transit and at rest where technically feasible
- Regular backups are conducted with appropriate security measures

6. Access Control and Monitoring

6.1 Authorized Personnel

Access to the CCTV system is restricted to:

- The System Manager and appointed deputies
- The Head Teacher and designated senior leadership team members
- The Designated Safeguarding Lead and deputies
- IT support staff (for technical maintenance only)

6.2 Viewing Conditions

- Images will be viewed and/or monitored in suitably secure and private areas
- Live monitoring stations are positioned to minimize unauthorized access
- All viewing sessions are logged with personnel details, time, and purpose

6.3 Remote Access

Where remote access is technically available:

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- Access is restricted to senior authorized personnel only
- Strong authentication measures are required
- All remote access is logged and monitored
- Remote access capabilities are regularly reviewed and updated

7. Access to Images and Data Subject Rights

7.1 Authorized Access

The System Manager must satisfy themselves of the identity and legitimacy of any request before authorizing access to CCTV images. Access may be granted in the following circumstances:

Internal School Purposes:

- When required by the Head Teacher for school management purposes
- To enable the Designated Safeguarding Lead to examine behaviour which may give rise to safeguarding concerns
- To assist in establishing facts in cases of unacceptable pupil behaviour (parents/guardians will be informed as appropriate)
- For health and safety investigations or risk assessments

External Authorities:

- When required by Police or other relevant statutory authorities
- To support child protection investigations by local authorities
- For insurance claims where required to pursue claims for damage to insured property
- In response to court orders or other legal requirements

7.2 Data Subject Rights Under UK GDPR

Individuals have the following rights regarding their personal data captured by CCTV:

Right of Access (Article 15):

- Individuals can request copies of CCTV footage containing their personal data
- Requests must be made in writing with specific details (date, time, camera location)
- The School will respond within one calendar month free of charge
- Identity verification is required before disclosure

Right to Rectification (Article 16):

- Individuals can request correction of inaccurate personal data
- This may involve annotation or deletion of incorrect information

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Right to Erasure (Article 17):

- Individuals may request deletion of their personal data in certain circumstances
- Each request will be assessed against legal obligations and legitimate interests

Right to Restrict Processing (Article 18):

- Individuals can request limitation of processing in specific circumstances
- Restricted data will be clearly marked and access limited

Right to Object (Article 21):

- Individuals can object to processing based on legitimate interests
- Each objection will be assessed against compelling legitimate grounds

7.3 Response Procedures

- All data subject requests will be acknowledged within 5 working days
- The School will provide a substantive response within one calendar month
- Complex requests may require an extension of up to two additional months
- Where requests are refused, clear explanations and appeal rights will be provided

8. Disclosure and Information Sharing

8.1 Disclosure Record Keeping

Where images are disclosed, a comprehensive record will be maintained including:

- Person/organization requesting/viewing the images
- Date and time of access
- Reason for viewing/disclosure
- Details of images viewed/disclosed
- Crime incident number (if applicable)
- Authorization given and by whom
- Any conditions attached to the disclosure

8.2 Third-Party Disclosure

When providing images to third parties:

- Steps will be taken to obscure images of non-relevant individuals where practicable
- Data sharing agreements will be established where appropriate
- Recipients will be informed of any conditions or restrictions

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- Follow-up will be conducted to ensure appropriate use and disposal

8.3 International Transfers

Should any CCTV data need to be transferred outside the UK:

- Appropriate safeguards will be implemented as required by UK GDPR
- Transfer impact assessments will be conducted
- Data subjects will be informed of the transfer and safeguards in place

9. Third-Party CCTV Systems

9.1 External CCTV Systems

The School does not own or manage third-party CCTV systems but may receive images from external providers where this aligns with our legitimate objectives and safeguarding responsibilities.

9.2 Data Sharing Agreements

Where third-party CCTV images are received:

- Formal data sharing agreements will be established
- The lawful basis for sharing will be documented
- Retention and disposal procedures will be agreed
- Data subject rights will be protected throughout

10. Staff Training and Awareness

10.1 Training Requirements

All staff with access to CCTV systems must receive training on:

- Data protection principles and UK GDPR requirements
- This CCTV policy and associated procedures
- Recognizing and reporting data protection incidents
- Safeguarding responsibilities related to CCTV usage

10.2 Regular Updates

- Annual refresher training will be provided
- Updates will be provided when legislation or procedures change
- New staff will receive CCTV training as part of their induction
- Training records will be maintained for audit purposes

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11. Data Security and Breach Procedures

11.1 Security Measures

The School implements appropriate technical and organizational measures including:

- Access controls and user authentication
- Regular security updates and system patches
- Physical security of equipment and storage areas
- Encryption of stored and transmitted data where feasible
- Regular security assessments and penetration testing

11.2 Data Breach Procedures

In the event of a CCTV data breach:

- The incident will be contained and assessed immediately
- The Data Protection Officer and senior leadership will be notified within 2 hours
- Risk assessment will be conducted to determine impact on data subjects
- The ICO will be notified within 72 hours if required by law
- Affected data subjects will be informed where legally required
- A full incident report will be prepared and remedial actions implemented

12. Privacy Notices and Transparency

12.1 Privacy Notice Integration

Information about CCTV processing is included in the School's privacy notices for:

- Pupils and parents
- Staff and volunteers
- Visitors and contractors
- Website users and general public

12.2 Transparency Measures

The School ensures transparency through:

- Clear and visible signage throughout monitored areas
- Detailed privacy notices explaining CCTV usage
- This policy being available on the School website
- Regular communication about data protection rights
- Clear contact information for data protection queries

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13. Monitoring and Review

13.1 Policy Review

This policy will be reviewed annually by the Data Protection Officer and Head Teacher to ensure:

- Continued compliance with legal requirements
- Alignment with current ICO guidance and best practice
- Effectiveness in meeting stated objectives
- Integration with safeguarding and other school policies

13.2 System Auditing

Regular audits will be conducted to assess:

- Compliance with this policy and legal requirements
- Effectiveness of technical and organizational measures
- Staff adherence to procedures and training requirements
- Data subject rights handling and response times

13.3 Continuous Improvement

- Feedback from data subjects, staff, and stakeholders will be considered
- Technological developments will be assessed for security and privacy benefits
- Regular benchmarking against sector best practices
- Integration of lessons learned from incidents or near-misses

14. Complaints and Queries

14.1 Internal Complaints

Complaints or queries regarding the School's CCTV system should be directed to:

- **First instance**: The System Manager (Ganesh Ukkusuri)
- **Escalation**: The Principal (Richard Settle)
- **Data protection matters**: The Data Protection Officer (Mark Taylor)

14.2 External Complaints

If internal resolution is not satisfactory, individuals may:

- Contact the Information Commissioner's Office (ICO)
- Seek independent advice from data protection organizations

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- Pursue legal remedies through appropriate courts

14.3 Response Commitment

- All complaints will be acknowledged within 5 working days
- Full investigation and response will be provided within 20 working days
- Complex cases may require additional time with regular updates provided
- Appeals processes are available for unsatisfactory outcomes

15. Related Policies and Procedures

This CCTV policy should be read in conjunction with:

- Data Protection Policy and Privacy Notices
- Safeguarding and Child Protection Policy
- Health and Safety Policy
- Behaviour Management Policy
- Staff Code of Conduct

This policy demonstrates our commitment to protecting the privacy and welfare of all members of our school community while maintaining the highest standards of safeguarding and security in accordance with Independent School Standards and UK data protection law.