



**WOODLANDS**  
SCHOOL

ASPIRATION, RESILIENCE, OPPORTUNITY, EXCELLENCE

# CCTV Policy

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Approved by Governors: February 2025

Review date: January 2025

Reviewing Panel: Finance, Estates and General Purposes (FEG)

Woodlands School is part of The Compass Education Trust Ltd, a company limited by guarantee, registered in England and Wales Company number 07666213.  
Registered Office: The Billericay School, School Road, Billericay, Essex, CM12 9LH

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## 1. Introduction

This document sets out the appropriate actions and procedures, which must be followed to comply with the Data Protection Act in respect of the use of CCTV (closed circuit television) surveillance systems managed by Woodlands School.

1.1 In drawing up this policy, due account has been taken of the following: -

- The Data Protection Act 1998;
- The CCTV Code of Practice produced by the Information Commissioner;
- The Human Rights Act 1998;
- The Regulation of Investigatory Powers Act 2000;
- GDPR 2018

1.2 The Data Protection Act 1998 came into force on the 1st March 2000 and contains broader definitions than those of its predecessor (1984) Act and more readily covers the processing of images of individuals caught by CCTV cameras. The changes in data protection legislation mean that for the first time legally enforceable standards will apply to the collection and processing of images relating to individuals.

1.3 An important new feature of the legislation is the CCTV Code of Practice which sets out the measures which must be adopted to comply with the Data Protection Act 1998. This goes on to set out guidance for the following of good data protection practice. The Code of Practice has the dual purpose of assisting operators of CCTV systems to understand their legal obligations while also reassuring the public about the safeguards that should be in place.

## 2. Scope

This policy will cover all employees of Woodlands School, sub-contractors, visitors and all other persons whose image(s) may be captured by the system.

## 3. Definitions

3.1 Prior to considering compliance with the principles of the Data Protection Act, a user of CCTV or similar surveillance equipment, will need to determine two issues:

3.1.1 The type of personal data being processed, i.e. is there any personal data which falls within the definition of sensitive personal data as defined by Section 2 of the Act; 'Sensitive personal data' includes:

- Gender;
- Ethnic origin or race;
- Political opinion;
- Religious beliefs;
- Trade Union membership;
- Health – mental or physical;
- Sexual life;
- Commission of any offence (or alleged);
- Any court proceedings or findings;

- 3.1.2 The purpose(s) for which both personal and sensitive personal data is being processed. The data must be:
- fairly and lawfully processed;
  - processed for limited purposes and not in any manner incompatible with those purposes;
  - adequate, relevant and not excessive;
  - accurate;
  - not kept for longer than is necessary
  - processed in accordance with individual's rights;
  - secure;
  - not transferred to countries without adequate protection;
- 3.2 The Information Commissioner will take into account the extent to which users of CCTV and similar surveillance equipment have complied with this Code of Practice when determining whether they have met their legal obligations when exercising their powers of enforcement.

## **4. Policy Application**

### **4.1 Purpose of system**

- 4.1.1 The purpose of the school CCTV system is to provide security coverage for the school property for the purpose of:
- Prevention or detection of crime or disorder;
  - Apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings);
  - Interest of public and employee Health and Safety;
  - Protection of property and assets.
  - Safeguarding of staff and students.

### **4.2 Siting the Cameras**

- 4.2.1 The location of the equipment has been carefully considered to ensure any images captured comply with the Data Protection Act.
- 4.2.2 All cameras are located in prominent positions within public and staff view and do not infringe on staff office areas. All CCTV surveillance is automatically recorded and any breach of these Codes of Practice will be detected via controlled access to the system and auditing of the system.
- 4.2.3 Signs have been erected throughout the site to ensure staff and visitors are aware they are entering an area that is covered by CCTV surveillance equipment.


### **4.3 System overview**

- 4.3.1 The system consists of internal cameras recording to a central hard drive recorder. This recorder has sufficient capacity to record up to 7 days of images, they are then automatically deleted. The cameras are used for recording of images only; there is no sound recording system.
- 4.3.2 Cameras are viewable at the Server Room, SLT Staff office PC's, The Head Teachers office & ICT technician office.

#### 4.4 Access to images

- 4.4.1 Where the images are required for evidential purposes the following processes will be followed;
- A. School – request for image is made through the helpdesk or in person to a member of Woodlands School ICT Support staff, SLT, The Head teacher or Operations Manager.
  - B. Woodlands School staff to check requester is on list of approved persons as contained in school CCTV policy.
  - C. Access to CCTV images is limited to staff trained in the use of the equipment.
  - D. If any Heads of Year or Assistant Heads of Year wish to review any images, First they must provide a copy of the “CCTV request to view” document signed by a member of SLT or The Head and then the footage is to be viewed on either SLT Staff office PC's or ICT technician office (with a member of SLT or ICT technician / Network manager present) images should not be downloaded unless **absolutely necessary** & then the “S212 Access Request Form” paperwork must be completed before hand.
  - E. Only persons trained in the use of the equipment and authorised can access and download data. Images should never be viewed in the presence of an unauthorised person or pupils.
  - F. All Woodlands School ICT Support staff, Heads Of Year, Assistant Head of Years, Safeguarding, SLT & Operations manager are trained to view and review images..
  - G. If a request for download of data is urgent, this should be specified at the time of request.
  - H. Review & download of images is limited to authorised trained Woodlands School staff:
    - a. ICT Support staff
    - b. Heads Of Year
    - c. Assistant Head of Years
    - d. SLT
    - e. Operations manager
    - f. The Head Teacher
  - I. All images downloaded are to be deleted from the system after 14 days unless required for legal purposes or on specific request from the school.
  - J. Access to the CCTV server is controlled by user name and password within a secure room in the school.
  - K. Viewing of CCTV images by parents / carers is at the discretion of the Head Teacher should he deem it to be necessary or a child protection issue.
  - L. Skanska Facilities Services CCTV covers the main entrances and fire exits only and is monitored in accordance with their own CCTV policy.
  - M. Woodlands School will obtain access to Skanska Facilities Services CCTV coverage and recordings as required and requested via a helpdesk call.

This policy will be monitored by Woodlands School to ensure agreed processes work in harmony with the Skanska Facilities Services CCTV policy.

Signed:   
Head Teacher

Dated: 5<sup>th</sup> February 2024

Signed:   
Chair of Governors

Dated: 5<sup>th</sup> February 2024