



**Transforming  
Futures**  
TRUST

## CCTV User Policy

Policy Information	
Policy Owner	Trust Safeguarding Lead
Issue Version	2.0
Approving Committee	Education and Safeguarding Committee
Adopted Date	April 2023
Review Cycle	Bi-Annual
Last Review Date	May 2025
Next Review Date	May 2027

### Adoption of the Policy

This Policy has been adopted and reviewed by the Trustees of Transforming Futures Trust

Signed:

Date: 16.06.25

## Version Control Amendments

Version No	Date	Summary of Changes
2.0	06/05/2025	All changes can be tracked in <a href="#">this</a> document
3.0	14/5/2025	Policy reviewed and updated: Addition of online reporting tool Updates to viewing of CCTV images 5.10 Updates to breaches of code 7.3 Updates to appendix 4 – authorised viewing list

## Contents

Version Control Amendments .....	2
1.0 Introduction .....	3
2.0 Objectives of the CCTV system .....	3
3.0 Statement of intent.....	3
4.0 Operation of the system .....	4
5.0 Storing and Viewing of CCTV Images .....	5
6.0 Requests to view or have copies of images by external agencies or individuals	6
7.0 Breaches of the code (including breaches of security) .....	7
8.0 Assessment of the scheme and code of practice .....	7
9.0 Complaints .....	7
Appendix 1 – Ace Sites with CCTV.....	8
Appendix 2 – CCTV Compliance Signs .....	9
Appendix 3 – Data Requests .....	9
Appendix 4 - Authorised viewing list .....	9

## 1.0 Introduction

- 1.1 The purpose of this policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system for Transforming Futures Schools. The Policy follows the Information Commissioner's CCTV Code of Practice.

## 2.0 Objectives of the CCTV system

- 2.1 To ensure the personal safety of students, staff and visitors;
- 2.2 To reduce the fear of crime;
- 2.3 To protect the school buildings and their assets;
- 2.4 To support the police in a bid to deter and detect crime;
- 2.5 To assist in identifying, apprehending and potentially prosecuting offenders;
- 2.6 To protect members of the public and private property; and
- 2.7 To assist in managing the school.
- 2.8 To assist the site leadership in ensuring that all areas covered by CCTV are appropriately staffed and supervised.

## 3.0 Statement of intent

- 3.1 The CCTV is part of our registration with the Information Commissioner's Office (ICO) under the terms of the Data Protection Act 2018.
- 3.2 The school will treat the system and all information, documents and recordings obtained and used as personal data under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.
- 3.3 Cameras are used to monitor activities within the school and the grounds to identify adverse activity actually occurring, anticipated or perceived, and for the purpose of securing the safety and wellbeing of the school's students, staff and visitors.
- 3.4 As much as is physically possible, images from private homes and gardens are kept out of range of the cameras and cannot be seen by the operator.
- 3.5 Materials or knowledge secured as a result of CCTV use will not be used for any commercial or media purpose. Information transferred to CD/DVD/Cloud Based Storage (or other appropriate media) will only be used for the investigation of

a specific crime or incident and will be logged using the online reporting tool [here](#).

- 3.6 The system has been designed to ensure maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or record every single incident taking place in the areas of coverage.
- 3.7 Warning signs, as required by the Code of Practice of the Information Commissioner, have been displayed.
- 3.8 Designated officers allowed to review CCTV images following incidents are Site Administrators, Site Leaders, Heads of Provision, Pastoral and Behaviour Teams, and the Senior Leadership Team. Other members of staff may be invited to view footage to assist with investigations.
- 3.9 See Appendix 1 for Sites with CCTV and the approved sign used to display and Appendix 2 for GDPR CCTV signage on site.

## 4.0 Operation of the system

- 4.1 The overall management of the CCTV systems across sites will be overseen by the member of the Senior Leadership Team with responsibility for the school premises. They are responsible for ensuring that the CCTV system is operated according to this policy and that regular audits are carried out to ensure that procedures are complied with. They are also responsible for the annual registration with the Information Commissioner. The DPO is responsible for this policy and for conducting the regular, and at least annual, audits of the CCTV system.
- 4.2 The day-to-day management, administration, maintenance, security and support of the system will be the responsibility of the Head teacher. This will be delegated to the site leaders.
- 4.3 The CCTV system will operate 24 hours each day, every day of the year, recording all activity in the areas covered. We ensure that our monitors are correctly sited, taking into account the images that are displayed.
- 4.4 Recordings will be held on system memory for a period of 28 days and then deleted. The DPO, in discussion with the Headteacher, is responsible for deciding what images will be retained, if required. The Head teacher is responsible for maintaining the recordings, ensuring their security and deleting them within the specified time period.
- 4.5 When installing CCTV there are several issues to be taken into consideration, such as:

- a. Where to position the cameras?
- b. Where to position the monitors?
- c. Who will operate the cameras?
- d. Who will handle requests for access to the images?
- e. How do we record who sees the images and for what purpose?
- f. Who do we authorise to access the images and for what purpose?

## 5.0 Storing and Viewing of CCTV Images

- 5.0 The persons authorised to operate the equipment and view the monitors are appropriate personnel. The appropriate personnel will have read the policy and received training in the operation of the particular systems used by the School. However, there may be occasions that will require contractors to view the monitors during the recording of live images and also images that have been recorded previously. It is important to remember that the viewing of all images from a CCTV system must be controlled and consistent with the purpose for which the system was installed. On a routine basis, this means that teaching and support staff cannot request to access footage.
- 5.1 Recorded material is stored in a way that maintains the integrity of the information and keeps it secure and in accordance with GDPR. This is to ensure that the rights of individuals recorded by the CCTV are protected and that the information can be used as either evidence in court or for the management of the school, as and when required.
- 5.2 If we are keeping information that may be used as evidence in court or for management of the school, we will keep a record/audit trail of how the information is handled.
- 5.3 Recorded images will be viewed by the nominated person/s for the site (usually Site Leader). The images will be viewed in a secure and nominated location. The monitoring or viewing of images is restricted to the DPO, the Head teacher or persons designated by the Head teacher, subject to any Subject Access Requests or requests by law enforcement (see appendix 3)
- 5.4 Where images are in an area of particular sensitivity such as a changing room, we will only view recorded images after an incident has occurred and with specific permission from the DSL.
- 5.5 The only person authorised to make copies (electronic or paper) of images are the DSL, SLT, Site Leaders or another person specifically directed by the Head teacher or the DPO.

- 5.6 All data stored for investigated purposes will be stored in accordance with our data retention policy.
- 5.7 When conducting a viewing, either of live images or recorded playback, the viewing should take place in the site office where the CCTV system has been installed and only staff who the leadership deem necessary to the investigation, should be present where relevant. Staff should take all reasonable precautions to ensure that no part of the footage can be seen from outside the secure office. Every effort should be made to ensure that no other members of staff enter the room while footage is being reviewed and that any infringement is logged on the online reporting tool.
- 5.8 Where CCTV footage has been viewed a record of this will be kept for monitoring purposes within the online reporting tool.
- 5.9 See Appendix 1 Sites with CCTV and location of monitors and CCTV GDPR sign
- 5.10 There is a recognition that many of the sites present challenges with the way in which they are physically configured. Given the complex nature of many of our students, it is sometimes necessary for site leads to review the cameras in real time. This should only ever be done to support with safeguarding staff and students and should never be used to make judgements on staff performance (except in instances of investigation of possible staff misconduct authorised by the head teacher or whereby staff/students are placed in potentially harmful situations).

## 6.0 Requests to view or have copies of images by external agencies or individuals

- 6.1 The school Data Protection lead (usually the Head Teacher) and/or the DPO will review all requests for disclosure of CCTV images. Such requests can be made under the GDPR, the Data Protection Act 2018 or the Freedom of Information Act 2001. Such requests may come from the police, solicitors or individuals. All requests will be considered in line with our Subject Access Request Policy.
- 6.2 When disclosing surveillance images of individuals, the DPO, in discussion with the Headteacher, will consider if obscuring of identifying features is necessary or not. This will depend on the nature and context of the footage that is being considered for disclosure.
- 6.3 See Appendix 3 CCTV Request Processing procedure.

## 7.0 Breaches of the code (including breaches of security)

- 7.1 The Head teacher, or a senior leader acting on their behalf, will initially investigate any breach of the Code of Practice by school staff. Any serious breach of the Code of Practice will be subject to the terms of disciplinary procedures already in place.
- 7.2 A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed will be investigated by the DPO.
- 7.3 Access to CCTV is not to be used by leaders to review the efficiency of Teaching and Learning by staff.

## 8 Assessment of the scheme and code of practice

- 8.1 The Head teacher, the DPO, or their representative, may carry out performance monitoring, including random operating checks. This will include infrequent monitoring of the online reporting tool.

## 9 Complaints

- 9.1 Any complaints about the schools' CCTV system should be addressed, in the first instance, to the DPO, who will investigate all complaints in accordance with the Information Commissioner's Code of practice.

## Appendix 1 – Sites with CCTV

CCTV	Monitor Position	Delegated CCTV Managers
Courtlands School	Reception	
ACE Tiverton Special School	G39 - Administrator Office	
Mount Tamar School	N/A	
ASP Bretonside	G13 Reception PL office	Lead Teacher / Pastoral Lead / Head of Provision
ASP Redruth	Office	Lead Teacher / Pastoral Lead / Head of Provision
ASP Dover Road	Office	Lead Teacher / Pastoral Lead / Head of Provision
ASP Exeter	Office	Lead Teacher / Pastoral Lead / Head of Provision
ASP Primary	Office	Lead Teacher / Pastoral Lead / Head of Provision
ASP Launceston	Office	Lead Teacher / Pastoral Lead / Head of Provision
ASP North Hill	G2 - Pastoral	Lead Teacher / Pastoral Lead / Head of Provision
ASP Bodmin	Office	Lead Teacher / Pastoral Lead / Head of Provision

## Appendix 2 – CCTV Compliance Signs



The scheme is controlled by Transforming Futures Trust.

For more information, contact: 01752 396151 [/estates@deltaservices.co.uk](mailto:/estates@deltaservices.co.uk)

## Appendix 3 – Data Requests

REQUESTS FOR PERSONAL DATA BY THE POLICE – Please see GDPR Policy 36 Requests for Personal Data by the Police.

REQUESTS FOR PERSONAL DATA BY THE POLICE FORM – Please see GDPR Policy 37 Requests for Personal Data by the Police Form.

## Appendix 4 - Authorised viewing list

Staff authorised to view recorded CCTV footage

- SLT
- Heads of Provisions
- Lead teachers/Site Leaders
- Pastoral Team
- Allocated staff designated by Head of Provision
- Members of staff assisting with investigations, authorised by SLT