Blackfen School for Girls



CCTV Policy

Headteacher: Ms C Senior
Chair of Governors: Mr W Stone

	Date	Name	Signature
Policy Date	February 2026		
Review Date	February 2027		
Review Period	Annually		
Lead Person	Business Manager	Gary Morgan	
Prepared by	Business Manager	Gary Morgan	
Verified by	Headteacher	Carrie Senior	
Approved by	Chair of Governors	William Stone	

Blackfen School for Girls

Introduction

Blackfen School will maintain a CCTV system consisting of a number of fixed & mobile cameras which will be located internally and externally.

The system will operate from a secure room in the Server Room and images can only be accessed by approved personnel. This policy sets out the purposes of the system and the procedures to be followed when managing the system.
The school reserves the right to use the images for the proper administration and running of the school where that may not be connected with the objectives if in the school's opinion it is appropriate to do so including for instance investigations into work related issues involving workers at the school.

This policy will be reviewed annually.

Objectives of the CCTV system

1. To protect the school's buildings and its assets.
2. To increase personal safety and reduce the fear of crime.
3. To support the Police in a bid to deter and detect crime.
4. To assist in the identifying, apprehending and prosecution of offenders.
5. To protect staff, students, members of the public and private property.
6. To monitor the welfare of students.

Statement of intent

The school will treat the CCTV system and all information, documents and recordings obtained in the strictest confidence.

CCTV cameras will be used to monitor activities within the school, its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the school and its visitors.

It will be ensured that private dwellings and property other than that in the periphery of a view that is focused upon school site locations will not be covered by the CCTV cameras.

The planning and design of the system will aim to ensure that the scheme gives maximum effectiveness and efficiency but it is recognised that no system can guarantee to cover or detect every single incident taking place in the areas of coverage.

Unless an immediate response to events is required to meet the objectives of the system, staff will not direct cameras at an individual, their property or a specific group of individuals.

Warning signs will be placed at key points to advise everyone that the area is covered by the school CCTV system.

Operation of the system

The management of the scheme will be the responsibility of the Headteacher.

The day-to-day management will be the responsibility of the ICT Support Engineer. Only authorised users may directly use the system. The names of the authorised users will be supplied by the Head Teacher. A list of authorised users will be kept by the Deputy Headteacher. See Appendix A.

The system will be in operation 24 hours a day, every day of the year.

Control of the system

The ICT Support Engineer will, on a daily basis, check that some of the cameras are functional and that the system is recording.

A maintenance contract is in place to carry out regular routine maintenance of the system and for emergency call out in the event of loss of image etc.

Authorised users and Managers of the CCTV system will satisfy themselves as to the identity of anyone wishing to have access to the images from the system and the purpose of the access. In the event that doubt of identity or purpose exists, permission will be refused.

Images captured by the system will be stored for a minimum of 30 days with the exception of the summer break where recordings will be kept for 50 days.

All store images will be kept in a secure place.

Images that need to be saved for longer periods must be approved by the Headteacher or Deputy Head.

When disposing of equipment which contains stored images, this equipment will be destroyed using a reputable company following the RoHS guidelines and a certificate of disposal maintained by the Business Manager.

Data Access

Authorisation to view images will be restricted to Leadership Team, Student Welfare Team, Business Manager, IT Manager, Site Manager, and Senior Assistant Site Manager. These people may authorise the viewing of images by other members of staff only when it is necessary to fulfil the objectives of the system, for example to identify a person in an image. Only the Headteacher, or in their absence the Deputy Head may authorise the viewing of images by non-staff members where it is necessary for the purposes of meeting the objectives of the system.

Internal Requests for information

A digital CCTV log will be maintained recording details of any requests for access to the system and the details of any data supplied, to whom, when and for what purpose.

External Request for Information

Applications received from outside bodies (e.g., police) to view or release records will be referred to the Headteacher. External bodies i.e., Highways Authorities, Prosecution Agencies and Legal Representatives will incur a charge to cover the costs of production and administration. (See item 3 below on Access to and disclosure of images to third parties. Completion of Appendix B or C is required for this.

Copies of images can be produced where required for the purposes of meeting the objectives of the system. A record will be kept in the CCTV log of the format of the copy (printed still image, DVD etc) and the person to whom the copy is given. No additional copies will be made without permission from a member of the LT. When no longer required for meeting the objectives of the system, all copies will be securely destroyed.

Complaints

Any complaints about the school's CCTV system will follow the school's usual complaints procedure. Complaints procedure is on Blackfen School for Girls web site School Information/Policies/Complaints/Procedures.

Public information

Copies of this policy will be available to the public from the school upon request or can be found on the school website.

Signed.....

Date.....

Access to and disclosure of images to third parties
Standards

All employees should be aware of the restrictions set out in this code of practice in relation to access to, and disclosure of, recorded images.

1. Access to recorded images will be restricted to those persons who need to have access in order to achieve the purpose(s) of using the equipment.

2. All access to the medium on which the images are recorded should be documented.

3. Disclosure of the recorded images to third parties should only be made in limited and prescribed circumstances. Subject to paragraph 1 above, in disclosure will be limited to the following classes of persons/agencies.
_ Law enforcement agencies, where the images recorded would assist in a specific enquiry.
_ Highways authorities in respect of traffic management matters.
_ Law enforcement agencies where the images would assist a specific criminal enquiry.
_Prosecution Agencies.
_Relevant legal representatives.

4. All requests for access or for disclosure should be recorded, if access or disclosure is denied the reason should be documented.

5. If access to or disclosure of the images is allowed, then the following will be documented. (Appendix B)
_ The date and time at which access was allowed or the date on which disclosure was made.
_ The identification of any third party who was allowed access or to whom disclosure was made.
_ The reason for allowing access or disclosure.
_ Location of the images.
_ Any crime incident number to which images may be relevant.
_ Signature of person authorised to collect the medium – where appropriate.

6. Recorded images will not be made more widely available – for example they should not be routinely made available to the media or placed on the Internet.

7. If it is intended that images will be made more widely available, that decision should be made by the Headteacher or designated member of staff and the reason for that decision should be documented.

8. If it is decided that images will be disclosed to the media (other than in the circumstances outlined above), the images of individuals will need to be disguised or blurred so that they are not readily identifiable.

Access by data subjects
Standards

1. In accordance with Section 7 of the Data Protection Act 2018 (Subject Access), an individual who believes that their image has been captured by this scheme is entitled to make a written request to the Data Controller. *Individuals have the right to submit a Subject Access Request (SAR) to gain access to their personal data in order to verify the lawfulness of the processing. The SAR will reviewed by the data controller of the school and will verify the identity of the person making the request before any information is supplied. A copy of the information will be supplied to the individual free of charge; however, the school may impose a 'reasonable fee' to comply with requests for further copies of the same information.*

2. All subject access requests should be referred in the first instance to the Headteacher who will liaise with the Business Manager (Data Controller).

3. All staff involved in operating the equipment must be able to recognise a request for access to recorded images by data subjects and how such requests are to be dealt with.

4. Data subjects should be provided with a standard subject access request form, a copy of this form is attached at appendix C, which:
a. Indicates the information required in order to locate the images requested.
b. Indicates the information required in order to identify the person making the request.
c. Indicates the fee that will be charged for carrying out the search for the images requested.
NB. The above form will also enquire whether the individual would be satisfied with merely viewing the images recorded. The form will also indicate that the response will be provided promptly and in any event within 40 days of receiving.

5. Individuals, at the time of any subject access request, will be given a description of the type of images recorded and retained and the purpose for which the recording and retention takes place. They should be informed of their rights as provided by the 1998 Act.

6. Prior to any authorised disclosure, the Headteacher will need to determine whether the images of another "third party".
Individual features in the personal data being applied for and whether these third-party images are held under a duty of confidence.

7. If third party images are not to be disclosed the System Manager shall arrange for the third-party images to be disguised or blurred.

8. If the Headteacher decides that a subject access request from an individual is not to be complied with, the following should be documented:
a. The identity of the individual making the request.
b. The date of the request.
c. The reason for refusing to supply the images requested.
d. The name and signature of the person making the decision.

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Appendix A

Authorised Users

Only the following authorised users may directly use the system. These have been authorised by the Headteacher and correct as of February 2026:

Job Title	Name	Signature
Headteacher	Carrie Senior	
Deputy Headteacher (Culture, Behaviour and Inclusion)	Ruth Makepeace	
Business Manager	Gary Morgan	
Assistant Headteacher	Loiyan Woodhouse	
Assistant Headteacher	Hollie Magrowski	
Student Welfare Manager	Clare Glen	
Student Support Officer	Kellie Smith	
Student Support Officer	Anne Osborne	
Student Support Officer	Kevin Loughlin	
Student Support Officer	Leigh Pidwell	
Student Support Officer	Sarah George	
Student Support Officer	Victoria Pascoe	
Site Manager	VACANT	
Assistant Site staff	Ryan Ginn	
IT Network Manager	CSE Support	
IT Deputy Network Manager	CSE Support	
Sixth Form Co-ordinator and Admissions Manager	Nicola Eiffert	
Sixth Form Study Centre Supervisor and Admin Assistant	Anna Thomas	
Office manager	Janice Clayton/Andrea Stannett	
Head's PA	Nicola Rogers	
Reception	Kirsty Estaugh/Emma Foley	

The school maintains a system of CCTV to promote staff and student safety. CCTV footage or images that are viewed by authorised staff to determine the outcome of an incident are recorded on the CCTV viewing form. The form requires information relating to the date, time and the identification of the camera used. Descriptions of footage can be taken for legitimate purposes only, for example in the investigation of a serious behaviour incident. The recording of CCTV footage only takes place in exceptional circumstances and for legitimate purposes.

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General Data Protection Regulation (GDPR) for the use of CCTV

The school have worked with our CCTV Company to ensure the school are following the guidelines on GDPR. The CCTV Company have conducted a Privacy Impact Assessment on Surveillance Camera System (CCTV).

Below are guidelines that the school have followed to comply with GDPR regulation.

CCTV cameras capture images that allow you to identify individuals, which means that these images fall within the GDPR's definition of personal data. You need to make sure you have appropriate signage in place to inform people that CCTV is in operation and why you are using it. This isn't a new

requirement and you should already be providing this information under the Data Protection Act 1998. However, the GDPR is more prescriptive and you should make sure that people are provided with all the privacy information required under the GDPR, possibly on your website or elsewhere on the premises.

When using CCTV systems, you also need to make sure they are only used for limited and specific purposes, the images recorded are relevant to those purposes, and recordings are not retained for longer than necessary. You also need to decide whether CCTV is a reasonable response to the issue you're seeking to address.

The GDPR is not designed to prevent you sharing personal data for legitimate reasons. However, if you're deciding whether to share information about banned individuals with other legal bodies, either directly or through a business crime reduction partnership, you need to make sure you're able to share the information in a way that complies with the requirements of GDPR.

For example, you'll need to address the following questions:

- Is the data sharing fair, legal and transparent?
- Is the information relevant to the other legal bodies I'm looking to share it with?
- Is the information accurate?
- Is the information shared in a secure format and manner?
- How would you and the other legal bodies respond to requests from individuals wishing to exercise their rights in relation to the information?
- Have you determined whether the information relates to the commission or alleged commission of an offence, thus bringing in additional requirements under GDPR?

It's important to remember that even if you're sharing images of an individual where you don't know their name, you are still processing personal data as it's likely that you or the other legal bodies involved will be able to identify the individual from the images alone or in combination with other information. The GDPR will apply in these scenarios.

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Appendix B

RECORDING OF VIEWING BY THIRD PARTY (e.g., Police)

Date and Time Access Allowed:

Date: _____ **Time:** _____

Identification of any third party who was allowed access:

Names of school staff present:

_____

_____

_____

Reason for allowing access: _____

Crime incident number if applicable: _____

Location of the images: _____

Signature of the person authorised to collect the medium – where appropriate:

_____

Date and time copy created for evidential purposes:

Date: _____ **Time:** _____

See section

Access to and disclosure of images to third parties

Standards

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Appendix C

FORM TO REQUEST ACCESS TO CCTV IMAGES (Parents, Public etc)

NAME: _____

ADDRESS:

_____
_____
_____
_____

DATE OF BIRTH: _____

TELEPHONE NUMBER: _____

Date image recorded: _____

Time image recorded: _____

Location: _____

To carry out a search for the images, a fee of £10.00 will be charged.

Please complete the above form and attach a £10.00 cheque made payable to Blackfen School for Girls

The Headteacher will consider the request and respond within 28 days.

See section

Access to and disclosure of images to third parties

Standards