



Gosfield School

CCTV Policy

Introduction

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Gosfield School. It also serves as a notice and a 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).

The system is administered and managed by the School, who act as the Data Controller. This policy will be subject to review from time to time, and should be read with reference to the School's Data Protection Policy. The School's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the School believes these purposes are all within its legitimate interests. Data captured for the purposes stated below as objectives will not be used for any commercial purpose.

Purpose and Scope

This policy applies to all CCTV systems operated or managed by Gosfield School and covers the collection, recording, viewing, storage, use and disclosure of CCTV images. It applies to all individuals who may be captured by the system, including pupils, staff, volunteers, contractors, visitors, parents and members of the public. The policy applies across all School premises and grounds where CCTV is operated and should be read alongside the School's Data Protection Policy, Privacy Notice, Safeguarding Policy and other relevant policies.

Data Controller and Responsibilities

Gosfield School is the Data Controller for CCTV images recorded by systems that it owns or manages. Overall responsibility for the appropriate use of the CCTV system rests with the School. The Operations Manager will act as System Manager and will be responsible for the day-to-day management and oversight of the system, supported by the Network Manager and IT team where appropriate. All individuals authorised to access CCTV footage are responsible for ensuring that it is accessed, viewed, used and disclosed only for legitimate and authorised purposes and in accordance with this policy and applicable data protection legislation.

Lawful Basis for Processing

The School processes CCTV images on the basis that such processing is necessary for the purposes identified within this policy and is justified by the School's legitimate interests, including the protection of pupils, staff and visitors, the prevention and investigation of crime, the protection of School property, the management of safeguarding and security incidents and the effective operation of the School. The School will ensure that the use of CCTV is necessary, proportionate and reasonable in relation to these purposes and will not use CCTV footage in a manner that is incompatible with the purposes for which it was collected.

Legitimate Interests Assessment

The School will maintain an appropriate assessment of its legitimate interests in operating CCTV, taking account of the benefits of CCTV in protecting pupils, staff, visitors and property against the potential impact on individuals' privacy. The School will regularly consider whether the use of CCTV remains necessary and proportionate and whether the purposes could reasonably be achieved by a less intrusive means. Where significant changes are proposed to the CCTV system, including the



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installation of additional cameras or significant changes to camera positioning or functionality, the School will review the relevant assessment before implementation.

Data Protection Impact Assessment

The School will maintain a Data Protection Impact Assessment (DPIA) covering its CCTV system where required by data protection legislation and guidance. The DPIA will consider the purposes and necessity of CCTV, the potential risks to the privacy and other rights of individuals, the positioning and functionality of cameras, access and security arrangements, retention periods and measures to reduce or mitigate identified risks. The DPIA will be reviewed periodically and whenever there is a significant change to the CCTV system, its use or the purposes for which CCTV images are processed.

CCTV and Staff Monitoring

CCTV will not be used as a routine means of monitoring staff performance or attendance. CCTV footage may, however, be reviewed where there is a legitimate and proportionate reason to do so, including in connection with a specific security incident, safeguarding concern, suspected misconduct, accident, complaint, investigation or other matter falling within the stated objectives of the CCTV system. Any such review must be limited to the footage reasonably necessary for the purpose and carried out only by an appropriately authorised person.

Objectives of the System

- To protect pupils, staff, volunteers, contractors, visitors and members of the public with regard to their personal safety
 - To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, contractors, visitors and members of the public
 - To support the police and community in preventing and detecting crime and to assist in the identification and apprehension of offenders
 - To monitor the security and integrity of the School site and deliveries and arrivals
- To monitor and uphold discipline among pupils in line with the School Rules, which are available to parents and pupils of the School
- To review CCTV footage where there is a legitimate and proportionate reason to investigate a specific security incident, safeguarding concern, suspected misconduct, accident, complaint or other matter falling within the stated objectives of the system.
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- To record system data (recorded video footage) for a set period of time to enable retrospective reviewing of any incidents where CCTV data may assist investigations.

Positioning

- Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives. Any significant addition, removal or repositioning of cameras will be subject to an appropriate review of necessity, proportionality and privacy impact before implementation. The locations, at the date of writing, are listed in Appendix 1.
- Adequate signage has been placed in prominent positions to inform those who enter the School premises that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.
- All fixed cameras are in plain sight on the School premises and the School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds.



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- No images will be captured from areas in which individuals would have a heightened expectation of privacy including, but not limited to, changing, washroom facilities and bedrooms.
- No images of public spaces will be captured except as background to cameras installed for a legitimate purposes such as at site entrances
- The School for the purposes of this policy includes all School grounds in Cut Hedge Park, sports centre, sports fields, prep school, performing arts centre and other properties owned or managed by the School.

Operation & Maintenance

- The system will be operational 24 hours a day, every day of the year.
- The System Manager will check, or arrange for the checking, and confirm that the system is properly recording and that cameras are functioning correctly on a regular basis.
- The system will be formally checked and to the extent necessary serviced no less than annually.
- The System Manager shall be the Operations Manager assisted by IT who will provide oversight for technical support and network connectivity.

Viewing of System Data

- The following staff may access CCTV footage where this is necessary for the performance of their role and where the access is consistent with the purposes of this policy: the Principal, Vice Principal, Bursar, Operations Manager and Network Manager. Access to CCTV footage will be limited to the minimum footage reasonably necessary for the particular purpose.
- Other staff may be authorised to conduct routine viewing of system data on occasions where authorisation is provided by the Principal, Vice Principal, Operations Manager, Bursar and Network Manager.
- Staff checking and servicing the system and network may, from time to time inadvertently see recording but shall not purposefully access the system other than for the express purpose of checking and serving the system and network
- All viewing of system data will be in a suitably secure and private area to minimise the likelihood of or opportunity for access by unauthorised persons
- Viewing, in this context, will include both real time and retained footage

Storage of Data

- The day-to-day management of system data will be the responsibility of System Manager or such suitable person as the System Manager shall appoint in his or her absence.
- Subject to the Clause below, system data will be stored for no more than 35 days and automatically over-written unless the School considers it reasonably necessary for the pursuit of the objectives outlined above to retain the system data for longer, or is lawfully required to do so by an appropriate third party such as the police or local authority. Such data shall be limited to the footage relevant to the purposes for which it is being retained.
- Where system data is retained, a log is automatically kept including the date, time and length of the recording, an outline of the purpose of the retention, the locations covered and where identifiable the names of groups or individuals recorded, automatically on the system.



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- All retained system data will be stored in one central, secure location determined by the Network Manager and wherever possible meet or exceed encryption and security standards recommended by ICO.

Access to Data

- Individuals have the right to access personal data the School holds on them (please see the Data Protection Policy), including information held on the system, if it has been retained, the school has the right to refuse the request should other individuals' identities be included.
- In line with Subject Access Requests under GDPR, the System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request.
- A CCTV Data Access request Form is available (See Appendix 2)
- The following are examples when the System Manager may authorise access to CCTV images:
 - Where required to do so by the Head, the Police or some relevant statutory authority;
 - To make a report regarding suspected criminal behaviour;
 - To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
 - To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian may be informed as part of the School's management of a particular incident;
 - To provide recordings on data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out above;
 - To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
 - In any other circumstances required under law or regulation;
 - Where the System Manager, or an appropriately authorised senior member of staff, reasonably considers that access is necessary and proportionate to achieve one of the stated objectives of the system.
- Where images are disclosed under the Clause above a record will be made in the system log book including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident or other reference number if applicable.
- Where images are provided to third parties under Clause 3 above, practical steps will be taken to obscure images of non-relevant individuals.

Other CCTV systems

The School does not own or manage any third party CCTV systems, but may be provided by third parties with images of incidents where this is in line with the objectives of the School's own CCTV policy, has legitimate and direct relevance to the operations of the School or is necessary as part of an investigative or process. For example, while investigating an incident on a bus, CCTV footage from the bus' CCTV system may be relevant.

Complaints and queries



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Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to the System Manager or Operations Manager in the first instance.



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Appendix 1 CCTV Camera Locations

Camera	Main School Building
1	Staff Car Park View
2	Main School Playground.
3	Outside Front Drive
4	Drive to Visitor Carpark
5	Outside Staff Entrance
6	Rear Visitor Carpark Door
7	Visitor Car Park View.
8	Finance Staircase
9	Sixth Form Common
10	Upper Corridor
11	Dining Hall
11a	IT Room
	Sports Hall.
12	Front Door
13	Outside Design Technology
14	Inside Foyer
15	Inside Corridor
16	GYM
	Prep School.
17	Outside Front Reception Door
18	Outside Nursery Entry Door
19	Corner View of Layby
20	Outside Rear Playground Door
	PAC.
21	Front View
22	Eco Centre View
23	Side view towards Astro
	Yard.
24	Groundsman Yard

This list is current as at September 2025 but may not be exhaustive or accurate as cameras are installed, removed or moved from time to time for operational reasons.



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Appendix 2 CCTV Data Access Request

The following information is required before the school can provide copies of or access to CCTV footage from which a person believes they may be identified.

Please note that CCTV footage may contain the information of others that needs to be protected, and that the school typically deletes CCTV recordings after 1 month

Name and address: (proof of ID may be required)	
Description of footage (including a description of yourself, clothing, activity etc.)	
Location of camera	
Date of footage sought	
Approximate time (give a range if necessary)	
Reason for request:	

Signature*

Print Name.....

Date.....

Signed
Principal

Date

1/9/2026

Date of next review: September 2027

