Lord's Independent School

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CCTV Policy and Procedure

Field	Detail
Policy owner	Headteacher
Date adopted	02/09/2025
Next review date	02/09/2027
Reviewed by	Proprietor
Regulatory framework	UK GDPR; Data Protection Act 2018; ICO CCTV Code of Practice; ISS 2014
Review schedule	Annual

1. Introduction

This policy sets out the principles governing the management, operation and use of the closed-circuit television (CCTV) system at Lord's School. The school operates CCTV cameras at key locations across its premises for the purposes set out in this policy. All use of CCTV is governed by the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Information Commissioner's Office (ICO) guidance on CCTV and surveillance cameras.

The school is registered with the ICO as a data controller and processes CCTV footage as personal data in accordance with its registration and this policy.

2. Objectives of the CCTV System

The school's CCTV system is operated for the following purposes:

- To promote and enhance the personal safety of pupils, staff, visitors and contractors on the school premises
- To protect the school's buildings, grounds and property
- To support the prevention and detection of crime and other misconduct on the premises
- To assist in the identification of individuals involved in criminal activity or serious misconduct, and to support any resulting investigation or prosecution
- To assist in the management and oversight of school activities where security is a relevant concern

CCTV will not be used for any purpose other than those set out above. In particular, CCTV will not be used as a tool for the routine monitoring of pupil or staff performance, or for any commercial purpose.

3. Legal Basis for Processing

The school processes CCTV footage on the legal basis of 'legitimate interests' under Article 6(1)(f) of the UK GDPR. The legitimate interests pursued are the safety and security of pupils, staff and the school's premises. The school has carried out a Legitimate Interests Assessment (LIA) and is satisfied that processing is necessary and proportionate, and that the interests of individuals whose images are captured are not overridden by those legitimate interests, given the safeguards in place.

4. Camera Locations and Coverage

CCTV cameras are positioned at the school entrance, key external perimeter points and in common areas within the school building. No cameras are positioned in areas where individuals have a reasonable expectation of privacy, including changing rooms, toilet facilities, medical rooms or staff offices. Cameras will not focus on private property adjacent to the school.

Signage is displayed at all points of entry to the school and in all areas covered by CCTV

to inform individuals that they are entering an area monitored by CCTV, in accordance with ICO guidance.

5. Covert CCTV

Covert CCTV may be deployed only for the purpose of investigating or detecting criminal activity or serious misconduct where there is a specific and reasonable suspicion that such activity is occurring and where overt CCTV would not be effective. The use of covert CCTV must be authorised in writing by the Headteacher, and the deployment must be proportionate to the seriousness of the suspected conduct. Any covert surveillance will be terminated as soon as the purpose for which it was authorised has been achieved. A record will be maintained of all authorisations.

6. Access to CCTV Footage

6.1 Authorised Access

Access to live and recorded CCTV footage is restricted to authorised persons only. Authorised persons are the Headteacher and any member of staff or contractor expressly authorised by the Headteacher to access footage for a specified purpose. A log of all access to recorded footage will be maintained, recording the date and time of access, the identity of the person accessing footage and the reason for access.

6.2 Disclosure to Third Parties

CCTV footage will be disclosed to third parties only in the following circumstances:

- To the police, for the prevention or detection of crime or the prosecution of offenders, following a formal request and with appropriate legal authority
- To children's social care or other statutory agencies, where disclosure is necessary to protect the welfare of a child
- In the context of disciplinary, grievance or legal proceedings where the footage is directly relevant to the matter under consideration
- Where the school is legally required to disclose footage

Footage will not be disclosed to the media for any purpose, save in exceptional circumstances where the police have formally requested disclosure to assist in a criminal investigation. Even in those circumstances, footage that might identify individuals other than those sought will be redacted where practicable.

6.3 Viewing by Individuals Shown in Footage

Where footage is to be used in disciplinary or other proceedings involving a member of staff, that individual will be given the opportunity to view relevant footage and to respond to it, consistent with the school's disciplinary procedures and natural justice.

7. Retention of Footage

Recorded CCTV footage will be retained for a maximum of 31 days, after which it will be automatically overwritten unless it is required to be retained for a specific purpose, such as

an ongoing investigation, legal proceedings or a police request. Where footage is retained beyond the standard period, the reason for retention will be recorded, and the footage will be stored securely with access restricted to the Headteacher. Extended retention periods will be reviewed at regular intervals to determine whether continued retention remains necessary.

8. Data Subject Rights

Individuals whose images are captured by the school's CCTV system have rights under the UK GDPR, including the right to request access to footage in which they appear (a Subject Access Request, or SAR). SARs must be submitted in writing to the school's Data Protection Lead and will be responded to within one month of receipt, in line with the school's Data Protection Policy. The school may redact or refuse to disclose footage where doing so would prejudice the prevention or detection of crime or the rights of other individuals.

9. Security and Data Protection

CCTV footage is stored securely and in accordance with the school's data protection obligations. The school's IT systems are protected against unauthorised access. The Headteacher is responsible for ensuring that the CCTV system, including its recording and storage equipment, is maintained in good working order and that access controls are reviewed regularly.

10. Responsibilities

The Headteacher is the responsible person for the school's CCTV operation and is accountable for ensuring compliance with this policy and with the school's obligations under data protection law. Day-to-day management of the system is delegated to the IT Manager. Any concerns about the use of CCTV or requests to access footage should be directed to the Headteacher.

11. Policy Review

This policy will be reviewed annually to ensure it remains compliant with UK GDPR, the Data Protection Act 2018, and ICO guidance on CCTV. Any material changes to the school's CCTV arrangements will trigger an earlier review.