CCTV Policy

St. Francis' College

September 2026

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Introduction

The 'College' refers to all the staff and pupils of the Prep Department and Senior College which includes Early Years Foundation Stage (EYFS), Pre-Prep (Key Stage 1), Prep (Key Stage 2), and Senior College (Key Stages 3-5).

St Francis College is committed to providing a safe, secure and welcoming environment for pupils, staff, visitors and contractors. The college recognises that the use of Closed-Circuit Television (CCTV) can play an important role in supporting the safety and security of the College.

Policy

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at St. Francis' College. It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the College 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 College, 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 College's Privacy Notice. For further guidance, please review the Information Commissioner's CCTV Code of Practice (accessible here: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/

All fixed cameras are in plain sight on the College premises and the College does not routinely use CCTV for covert monitoring or monitoring of private property outside the College grounds.

Camera locations will be:

Main Front Entrance, left side and rear of Broadway Building
Prep Car Park & Entrances
Loggia Garden
Phoenix Courtyard Entrances
Internal entrances next to Boarding staircases (from Phoenix Courtyard)

Further camera locations may be added to the above list as risks identified. Staff will be notified and the policy will be updated fully at the review date.

The College's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the College believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

Objectives of the System

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- To protect the College buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- To monitor the security and integrity of the College site and deliveries and arrivals, including car parking and number plate recognition.

- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the *College Rules*, which are available to parents and pupils on request.
- Assist in Safeguarding and protection of pupils and other members of the College Community.
- Support the effective management and security of the college's premises, buildings and grounds.

Positioning

External Locations have been selected within the College perimeter, that the College reasonably believes require monitoring to address the stated objectives.

Cameras will be positioned so that they can capture images relevant to the purposes set out in this policy.

Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area, identifying the College as the Data Controller and giving contact details for further information regarding the system.

No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.

No images of public spaces will be captured except to a limited extent at site entrances.

CCTV coverage will be reviewed to identify significant blind spots and assess whether additional or repositioned cameras are necessary. Any decision to install or reposition cameras will be based on the assessment of the identified security, safeguarding or operational needs and will consider proportionality of privacy and data protection requirements.

Maintenance

The CCTV System will be operational 24 hours a day, every day of the year. The System Installer (TTM security) will check and confirm that the System is properly recording, and that cameras are functioning correctly, upon installation. The System will be regularly checked by authorised staff. The System Manager will ensure that all devices are working correctly; the Operations Manager will arrange for any remedial repairs to be carried out by TTM.

Supervision of the System

Staff authorised by the College to conduct routine supervision of the System may include the Head, Deputy Head (Pastoral), Operations Manager, Area Health and Safety and Compliance Officer and anyone reasonably delegated to view images e.g. DSL. Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

Storage of Data

The day-to-day management of images will be the responsibility of the Operations Manager who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.

Images will be stored for 31 days and automatically over-written unless the College considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority. Where such data is retained, it will be retained in accordance with the Act and our Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded in the system log book.

CCTV data supplied to Police for the purpose of prevention or detection of crime and for the apprehension or prosecution of offenders for such incidents will be covered under a Data Protection Act 1988 – section 29 (3) Form supplied by Hertfordshire Constabulary or other Police division.

Access to Images

Access to stored CCTV images will only be given to delegated authority, under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

Individuals also have the right to access personal data the College holds on them (please see the College's Privacy Notice, including information held on the System, if it has been kept. The College will require specific details including at least to time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

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. The following are examples when the

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 College in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian will be informed as part of the College's management of a particular incident;
- To data subjects (or their legal representatives) pursuant to an Access to Images request under the Act and on the basis above;
- To the College'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 images are disclosed under the individual's right to access images 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 number (if applicable).

Other CCTV systems

The College does not own or manage third party CCTV systems, but may be provided by third parties with images of incidents where this in line with the objectives of the College's own CCTV policy and/or its College Rules.

Many pupils travel to College on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The College may use these in establishing facts in cases of unacceptable pupil behaviour, in which case the parents/guardian will be informed as part of the College's management of a particular incident.

Complaints and queries

Any complaints or queries in relation to the College's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Deputy Head, Head of Operations.

For any other queries concerning the use of your personal data by the College, please see the College's applicable Privacy Notice.

Version Control

Reviewed by	Operations Manager
Authorised by	Head
Effective From	September 2026
Next Review Date	September 2027