



THE ALTUS SCHOOL

CCTV POLICY


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Document Control & Record of Amendments

Version	Reason for Amendment	Sections Amended	Amended by & Date	Reviewed by & Date	Approved by & Date
1.0	N/A	N/A	N/A	T Wallbank September 2024	E Gundry September 2024
2.0	Review date reached	Adoption and review date	T Wallbank October 2025	T Wallbank October 2025	E Gundry October 2025

1.0 Policy Statement

The purpose of this policy is to regulate the management, operation and use of the Close Circuit Television (CCTV) at the Altus School

2.0 Introduction

The Altus School uses CCTV images for the purpose of enhancing security of the building and its associated equipment, to reduce the threat of crime generally, protecting our premises and helping to ensure the safety of all staff, pupils and visitors. The CCTV systems are installed with a mindfulness among occupants that a surveillance security system is in operation within the premises and in the external environs, during both daylight and night hours each day.

The system comprises a number of fixed and dome cameras located externally to provide coverage of the gates, outside play facilities and car parks, and within the school premises in communal areas, corridors, classrooms and other teaching spaces.

This policy takes account of all applicable legislation and guidance, including:

UK General Data Protection Regulation (“GDPR”)
Data Protection Act 2018
CCTV Code of Practice produced by the Information Commissioner
Human Rights Act 1998
Surveillance Commissioner Code of Practice

The CCTV system is owned and operated by the Altus School, the deployment of which is determined by the School Leadership Team and is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and the GDPR.

This policy relates to the location and use of CCTV and the monitoring, recording and subsequent use of the recorded material.

The introduction of, or changes to, CCTV monitoring will be subject to consultations with staff and members of the school community.

3.0 Scope

This policy applies to all staff, management committee, contractors, agents, volunteers, representatives and temporary staff, working for or on behalf of the school. The requirements of this policy are mandatory for all of these parties.

4.0 Purpose of CCTV

The Altus School uses CCTV for the following purposes:

- To provide a safe and secure environment for pupils, staff and visitors
- To prevent the loss of or damage to the Altus School buildings and/or assets
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders
- To promote the health and safety of staff, pupils and visitors
- To monitor student behaviour
- To prevent bullying
- To ensure that the school rules are respected so that the school can be properly managed.

CCTV monitoring will never be used to monitor a member of staff's capability but may be used to observe their actions in instances where there are safeguarding or conduct concerns. When monitoring student behaviour in classrooms, it is done with the permission of the teacher. Staff are given the opportunity to deny permission via a consent form at the start of each academic year, and through the induction process for staff joining the school mid-year.

5.0 Siting of Cameras

All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors. Members of staff will have access to details of where CCTV cameras are situated.

Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The Altus School will make all reasonable efforts to ensure that areas outside of the school premises are not recorded.

CCTV warning signs will be clearly and prominently placed at the main external entrance to the school. In areas where CCTV is used, the school will ensure that there are prominent signs placed within the controlled area to inform individuals that they are in an area within which CCTV is in operation.

CCTV video monitoring and recording of public areas may include the following:

- Protection of School Buildings and Property: the building's perimeter, entrances and exits, lobbies and corridors
- Video Patrol of Public Areas: parking areas, main entrance/exit gates
- Monitoring Student Behaviour: classrooms, recreation rooms and other teaching spaces
- Safeguarding: all areas
- Verification of Security Alarms: intruder alarms, exit door controls, external alarms

6.0 Privacy Impact Assessment

Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted to ensure that the proposed installation is compliant with legislation and ICO guidance.

7.0 Management and Access

Supervising the access and maintenance of the CCTV system is the responsibility of the Director. The Director will delegate the administration of the CCTV to the Operations Manager. The CCTV system will be checked weekly by the Operations Manager to ensure that it is operating effectively.

Access to the system will be restricted to approved staff, as required to fulfil the duties of the school. These staff are:

- Centre Managers at each Altus school centre
- Senior Leader at each school centre
- Operations Manager
- Director (Headteacher)
- Deputy Director (Deputy Headteacher)
- Rob Stewart, Siren Alarms (CCTV provider), for the purpose of supporting access for one of the above named staff members only.

8.0 Storage and Retention of Images

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

Recorded images are stored only for a period of 14 days unless there is a specific purpose for which they are retained for a longer period.

CCTV monitoring of public areas (which could also include classrooms) for security purposes will be conducted in a manner consistent with all existing policies and related legislation. Video monitoring of public areas for security purposes within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy. Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the school.

CCTV monitoring will never be used to monitor a member of staff's capability but may be used to observe their actions in instances where there are safeguarding or conduct concerns.

The Altus School will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

- CCTV recording systems being located in restricted access areas;
- Restriction of the ability to make copies to specified members of staff;
- A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by the Operations Manager.

9.0 Disclosure of Images to Data Subjects

Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation and has a right to request access to those images.

Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the Altus School's Data Protection Policy.

All requests should be made in writing to the Data Protection Officer. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example time, date and location.

When such a request is made the Director will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The Altus School must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals then the Altus School must consider whether:

- The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
- The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
- If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

A record must be kept, and held securely, of all disclosures which sets out:

- When the request was made;
- The process followed by the Director in determining whether the images contained third parties;
- The considerations as to whether to allow access to those images;
- The individuals that were permitted to view the images and when; and
- Whether a copy of the images was provided, and if so to whom, when and in what format.

10.0 Disclosure of Images to Third Parties

The Altus School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

If a request is received from a law enforcement agency for disclosure of CCTV images then the Altus School must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

The information above must be recorded in relation to any disclosure.

If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

11.0 Review of CCTV Policy

This policy will be reviewed annually.

12.0 Misuse of CCTV Systems / Policy Breach

The misuse of CCTV system could constitute a criminal offence.

Any breach of the Code of Practice by school staff or other person who is bound by this policy will be initially investigated by the Director/Chair of the Management Committee in order for him/her to take the appropriate disciplinary action.

Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach

13.0 Complaints relating to this policy

Any complaints relating to this policy or to the CCTV system operated by The Altus School should be made in accordance with the school's Complaints Policy.

14.0 Links to other policies

The Altus School will consider the CCTV Policy when developing other policies, in particular:

- Freedom of Information policy
- General Data Protection Regulation policy
- Grievance policy
- Health & Safety policy