



## CCTV Policy

**Related documents: What We Do & How We Do It Policy**

**Published: July 2019**

### OUR VISION

Our vision is to provide pupils with the confidence, skills and ambition to achieve a successful and productive life. We aim to ensure they leave the school with a 'new day, new opportunity' ethos and are capable of becoming positive members of their communities. To do this, we have 3 principles that underpin our policies, practices and everything we do:

- Everyone can learn, achieve and has the potential to be successful
- Positive relationships are key to success and are underpinned by mutual trust, respect and caring for one another
- We have high expectations in everything we do

### VISION

<b>Policy owner</b>	WhiteTrees School	<b>Last review</b>	November 2025
<b>Date Created</b>	July 2019	<b>Next review</b>	November 2026

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## Introduction

**The objective of this policy is to clarify White Trees Independent School use of Closed-Circuit Television (CCTV) in the daily operation of its schools.**

## Legal Framework and Lawful Basis

This policy operates in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Information Commissioner's Office (ICO) CCTV Code of Practice.

WhiteTrees School processes CCTV images under:

Article 6(1)(e) UK GDPR – task carried out in the public interest (safeguarding and security); and

Article 6(1)(f) – legitimate interests, including the prevention of crime and protection of individuals and property.

Where images involve children, enhanced safeguards are applied.

## Statement of Purpose

White Trees School use of CCTV is crucial in ensuring the safety and security of pupils, staff and visitors in our specialised school environments. It also ensures the protection of buildings and facilities. The Purley Farm Site is the only site that operates Classroom CCTV. At all other sites, CCTV is limited to communal and external areas.

## Data Protection Impact Assessment (DPIA)

A Data Protection Impact Assessment has been completed for the use of CCTV across WhiteTrees School sites (see Appendix 1 of this policy). A DPIA has also been completed for classroom use at Purley Farm site (Appendix 2).

The DPIA is reviewed regularly and whenever there are changes to CCTV use, coverage, or technology.

# Use of CCTV

WhiteTrees School's use of CCTV is part of our strategy to enhance and maintain safety and security throughout our school. Our use of CCTV, as in accordance with GDPR, is transparent:

- Signage alerting visitors to our use of CCTV is prominent in entrances to our school buildings

All families and their children visit the school prior to placement as part of the referral and assessment process, during which use of CCTV is explained and seen.

All staff are familiar with this policy as part of their induction to the schools.

CCTV cameras are installed in communal areas (and classrooms at Purley Farm Site), as part of the school's routine safeguarding, safety, risk management within a specialist education setting.

CCTV is not used for routine monitoring of teaching quality, staff performance, or day-to-day behaviour management. Footage is reviewed only where necessary to support safeguarding, safety, or the investigation of serious incidents or allegations.

CCTV is monitored at screens in the leadership office.

Recording operates 24 hours a day. CCTV images are stored securely on the internal DVR system for no longer than 30 days, unless required for an ongoing safeguarding concern, investigation, or legal obligation.

The CCTV systems at all our sites are maintained by FSL.

Images are **only** downloaded and shared securely in the following circumstances:

- For the police to aid their investigations, as appropriate
- For disciplinary purposes (eg. in the case of a physical allegation made against a member of staff or a pupil).

CCTV footage will only be shared where there is a clear lawful basis, including:

- Requests from law enforcement agencies
- Safeguarding investigations
- Disciplinary processes where necessary and proportionate

Any disclosure is documented and authorised by the Executive Head Teacher or the Head of Safeguarding.

# Signage and Transparency

Clear and prominent signage is displayed at all school entrances and in monitored areas.

Signage states:

- That CCTV is in operation
- The purpose of surveillance
- The name of the data controller
- Contact details for further information

## Data Controller & Contractor Responsibilities

Data Controller and Contractor Responsibilities

WhiteTrees School is the Data Controller for CCTV data.

Any external contractors involved in the maintenance or support of CCTV systems operate under a written data processing agreement and do not access personal data unless authorised.

### Data Subjects' Rights

Recorded images, if sufficiently clear, are considered to be personal data of the individuals whose images have been recorded by the CCTV. Data subjects have a right to access their personal data, under the right circumstances, under the data protection legislation. They also have other rights, in certain circumstances, including to have their data erased, rectified, and to restrict processing and object to processing.

Requests for access to CCTV footage must be made in writing. Requests will be responded to within one calendar month, subject to identity verification and consideration of the rights of other individuals captured in the footage.

Where necessary, images of third parties will be redacted or blurred.

## Policy Review

This policy is reviewed annually or earlier if legislation, ICO guidance, or school operations change. This policy is reviewed alongside the Safeguarding & Child Protection Policy and the CCTV DPIA to ensure consistency across safeguarding and data protection arrangements.

# Data Protection Impact Assessment (DPIA)

## CCTV Use at WhiteTrees School

### Organisation Details

**Organisation:** WhiteTrees School

**Role:** Data Controller

**Policy Owner:** Laura Bull (Executive Head Teacher)

**Data Protection Lead:** Lukas Bradon (Head of Safeguarding)

**Date of DPIA:** November 2025

**Review Date:** annually/ upon change

### Description of the Processing

#### What processing is taking place?

WhiteTrees School operates a Closed-Circuit Television (CCTV) system across its school sites. The system records visual images of pupils, staff, and visitors for safeguarding, safety, and security purposes.

CCTV footage is recorded continuously (24 hours per day) and stored securely on an internal Digital Video Recorder (DVR) system.

#### Where is CCTV located?

CCTV cameras are located in:

- Entrances and exits
- Corridors and communal areas
- Outdoor areas within school grounds
- Some classrooms used by pupils, as part of the school's routine safeguarding and risk-management arrangements.

CCTV is **not installed** in:

- Toilets
- Changing areas
- Therapy rooms
- Offices or private staff spaces

#### Who is affected by the processing?

- Pupils (including children and young people with additional and complex needs)
- School staff
- Visitors, contractors, and professionals

Children are recognised as a vulnerable data subject group, and enhanced safeguards are applied.

### Purpose of CCTV Processing

The purposes of CCTV use at WhiteTrees School are:

- Safeguarding pupils and staff
- Protecting pupils who may present with high-risk behaviours
- Preventing and detecting crime or serious incidents
- Supporting investigations into safeguarding, health and safety, or disciplinary matters
- Protecting school buildings, equipment, and property

CCTV is **not used** for:

- Grading or appraisal of teaching quality
- Performance management

CCTV may be used to support safeguarding oversight, incident review, and pupil safety where this aligns with the school's safeguarding duties and risk assessments.

## **Lawful Basis for Processing**

WhiteTrees School primarily relies on:

**Article 6(1)(e) UK GDPR** (task carried out in the public interest), reflecting its statutory safeguarding and education duties.

**Article 6(1)(f)** (legitimate interests) applies additionally in relation to site security and the protection of property.

Where footage involves children, processing is supported by safeguarding duties under education and child protection legislation.

Special category data is not intentionally processed, although behaviour or distress may be visible incidentally. Appropriate safeguards are in place.

## **Necessity and Proportionality**

### **Why is CCTV necessary?**

WhiteTrees School supports pupils with complex emotional, behavioural, and mental health needs. CCTV provides an additional safeguarding measure where risks cannot be adequately managed through staffing alone.

### **Why is CCTV proportionate?**

- Camera placement is limited and targeted
- Classroom CCTV is used following risk assessment
- Footage is accessed only when necessary
- Retention is limited to a maximum of 30 days

Less intrusive measures (e.g. staff supervision, behaviour plans) are used as primary controls, with CCTV acting as a supplementary safeguard.

## **Data Minimisation and Retention**

- CCTV footage is retained for **no longer than 30 days**
- Footage is only retained beyond this period if required for:
  - Safeguarding investigations
  - Disciplinary processes
  - Legal or police enquiries

Once no longer required, footage is securely deleted or overwritten.

**Access, Security, and Storage**

- CCTV footage is stored securely on internal DVR systems
- Access is restricted to authorised senior staff only
- Footage is password-protected
- Any viewing or downloading of footage is logged

External contractors involved in system maintenance operate under written data processing agreements and do not access footage unless authorised.

**Data Subject Rights**

Individuals whose images are captured have rights under UK GDPR, including:

- Right of access (Subject Access Requests)
- Right to erasure (where applicable)
- Right to restrict or object to processing

Requests must be made in writing and will be responded to within one calendar month, subject to identity verification and the rights of other individuals captured in the footage.

**Transparency Measures**

- Clear CCTV signage is displayed at entrances and monitored areas
- Signage explains the purpose of CCTV and identifies WhiteTrees School as the Data Controller
- CCTV use is explained to pupils, families, and staff during induction and admission processes

**Risk Assessment**

<b>Risk</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Outcome after mitigation measures</b>	<b>Mitigation Measures</b>
Invasion of privacy	Medium	High	Low	Limited camera placement, no CCTV in private areas
Misuse of footage	Low	High	Low	Restricted access, staff training, audit trails
Unlawful disclosure	Low	High	Low	Senior authorisation, audit trails
Excessive monitoring	Medium	Medium	Medium	Clear policy

**Consultation**

The DPIA has been completed with consideration of:

- Senior leadership and the Leadership Team

- Safeguarding responsibilities
- Data protection obligations

Staff are informed of CCTV use through induction and policy access.

**Decision and Sign-Off**

This DPIA concludes that CCTV use at WhiteTrees School is necessary, proportionate, and lawful, provided that the controls and safeguards outlined are maintained.

**Approved by:**

Name: \_\_\_\_\_

Role: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**DPIA Review Log**

Date	Reason for Review	Outcome	Approved By
December 2025	Initial DPIA approval	Approved for implementation	Executive Head Teacher
	Annual review	No change / Amendments required	Compliance Officer

# **DPIA Summary for Inspectors**

This Data Protection Impact Assessment (DPIA) has been completed to assess the use of Closed-Circuit Television (CCTV) at WhiteTrees School in accordance with the UK GDPR, the Data Protection Act 2018, and the ICO CCTV Code of Practice.

CCTV is used as a supplementary safeguarding and safety measure to protect pupils, staff, and visitors, particularly in a specialist setting supporting children and young people with complex emotional, behavioural, and mental health needs.

## **Key assurances for inspectors:**

- CCTV has a clear lawful basis under Article 6(1)(e) (public task) and Article 6(1)(f) (legitimate interests)
- Children are recognised as a high-risk data group, with enhanced safeguards in place
- CCTV is not used for routine behaviour monitoring or staff performance management
- Classroom CCTV is used only where a documented risk assessment identifies a safeguarding need. At Purley Farm, Classroom CCTV is used routinely as part of the school's safeguarding framework, supported by documented risk assessments
- Footage access is restricted, logged, and retained for no longer than 30 days unless required for safeguarding or legal reasons
- A full CCTV Policy and this DPIA are reviewed annually

The school has determined that the residual risk of CCTV use is low to medium and proportionate, given the safeguarding controls in place.

# **Classroom CCTV Use**

## **Purpose**

This appendix sets out the specific criteria under which CCTV may be used in classroom environments at WhiteTrees School. CCTV is only used in classrooms at Purley Farm Site

## **Safeguarding Rationale**

Classroom CCTV is used routinely as part of WhiteTrees School's safeguarding and risk-management arrangements in a specialist setting.

The routine use of classroom CCTV is justified by:

- The vulnerability and complexity of the pupil cohort
- The need for effective oversight to safeguard pupils and staff
- The requirement to accurately review and respond to incidents or allegations

CCTV does not replace staff supervision or therapeutic support and is used alongside relational, trauma-informed practice.

## **Decision-Making Process**

Classroom CCTV use must be:

- Supported by a documented risk assessment
- Approved by the Executive Head Teacher and Safeguarding Lead
- Reviewed regularly and removed when no longer necessary

## **Safeguards**

- Cameras positioned to minimise intrusion and focus on safety rather than surveillance
- No audio recording
- Clear prohibition on use for routine performance management
- Footage accessed only for safeguarding, safety, or serious incident review
- Regular review of camera placement and continued necessity

## **Review and Removal**

The continued use of classroom CCTV is reviewed:

- At least termly
- Following any serious incident
- When pupil risk levels change

## **Alignment with Safeguarding Policy**

The routine use of CCTV, including within classrooms, aligns with the principles and safeguarding duties set out in the WhiteTrees Safeguarding and Child Protection Policy, including that:

- The welfare of the child is paramount
- Safeguarding measures must be proportionate to identified risks
- Children with additional vulnerabilities may require enhanced oversight and supervision

- Safeguarding practice must be protective, relational, and responsive to trauma and need

In this context, CCTV is used as a protective safeguarding measure to support oversight, accountability, and the safe management of incidents and allegations. CCTV is not used punitively, nor as a substitute for professional care, supervision, or positive, relationship-based practice.

Published on	
By	
Chair of Gov Sig/Date	
Head Teacher Sig/Date	

