CCTV Policy

Reviewed by: Facilities Manager

Last Review: November 2026

Next Review: November 2027

Circulation: This policy has been adopted by the governors and is available to parents on request. It is addressed to all members of staff and volunteers and applies wherever they are working with children.

'Parents' refers to parents, guardians and carers.

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) System at DLD College London. It also serves as a notice and a guide to data subjects (including students, 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 Data Protection Policy. For further guidance, please review the Biometrics and Surveillance Camera Commissioner's CCTV Code of Practice: Surveillance Camera Code of Practice

All fixed cameras are in plain sight on the College premises. The College does not routinely use CCTV for covert monitoring or monitoring of private property outside the College grounds. The cameras with locations covered are listed in a folder, held with the Facilities Manager.

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.

1. Objectives of the System

1.1 To protect Students, staff, volunteers, visitors and members of the public with regard to their personal safety.

1.2 To protect the College building and equipment, and the personal property of students, staff, volunteers, visitors and members of the public.

1.3 To support the police and community in preventing and detecting crime and assist in the identification and apprehension of offenders.

1.4 To monitor the security and integrity of the College site, deliveries and arrivals.

1.5 To monitor staff and contractors when carrying out work duties.

1.6 To monitor and uphold discipline among students in line with the College Rules, which are available to parents and pupils on request.

2. Positioning

2.1 Locations have been selected, both inside and out, that the College reasonably believes require monitoring to address the stated objectives.

2.2 Adequate signage has been placed in prominent positions to inform staff and students that CCTV is in operation and that they are entering / in a monitored area.

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

3. Maintenance

3.1 The CCTV System will be operational 24 hours a day, every day of the year.

3.2 The Facilities Manager will check and confirm on a regular basis that the System is properly recording and that cameras are functioning correctly.

3.3 The System will be serviced by the appointed contractor ‘Boundary Surveillance’ no less than annually.

4. Supervision of the System

4.1 Staff authorised by the College to conduct routine supervision of the System include the Facilities Manager, HouseParents, IT, Administration Officer and the ELT.

4.2 Members of the Executive Leadership Team (ELT) have access to the basement "Hub" CCTV system via a secure web page for operational, safeguarding, health and safety, security and disciplinary purposes. Access credentials will be issued individually and must not be shared.

4.3 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.

5. Storage of Data

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

5.2 Data will be stored and available for viewing for 4 weeks on the NVR then will be continually automatically over-written with fresh data 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.

5.3 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 logbook.

6. Access to Images

6.1 Access to stored CCTV images will only be given to authorised persons, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

6.2 Individuals also have the right to access personal data the College holds on them (please see the Data Protection Policy), including information held on the System, if it has been kept. The College will require specific details including at least the 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.

6.3 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 System Manager may authorise access to CCTV images:

6.3.1 Where required to do so by the Principal, college staff, the Police, or some relevant statutory authority.

6.3.2 To make a report regarding suspected criminal behaviour such as damage to premises or theft.

6.3.3 To make a report regarding suspected prohibited substance use such as smoking / vaping, drugs and alcohol consumption.

6.3.4 To use as evidence and assist investigations for any reported accidents or near miss incidents.

6.3.5 To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern.

6.3.6 To assist the College in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardian will be informed as part of the College's management of a particular incident.

6.3.7 To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 6.2 above.

6.3.8 To the College's insurance company where required in order to pursue a claim for damage done to insured property.

6.3.9 In any other circumstances required under law or regulation.

6.4 Where images are disclosed under 6.3 above a record will be made in the system logbook 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).

6.5 Where images are provided to third parties under 6.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

7. Other CCTV systems

7.1 The College does not own or manage 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 College's own CCTV policy and/or its College Rules.

7.2 Many students travel to sports/trips on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The College may request footage to view for establishing facts in cases of unacceptable student behaviour, in which case the parents/guardian will be informed as part of the College's management of a particular incident.

8. Complaints and queries

8.1 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 Facilities Manager.

CCTV FOOTAGE ACCESS REQUEST

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

For data protection reasons, the College may not be able to share CCTV footage if other individuals can be seen in the footage or their images cannot be edited to protect their identity.

Footage may only be accessed / saved if authorised by the Principal or member of the ELT.

Please note that CCTV footage may contain the information of others that needs to be protected, and that old data stored on the NVR automatically overwrites itself with fresh data after a 4-week period.

Name of requestor	
Date of footage sought	
Approximate time (give a range if necessary)	
Location of Camera / Area	
Description of footage / incident required	
Any distinguishing factors that will help in locating footage/individuals? I.e., clothing worn, hair style,	

Signature*……

Print Name…… Date ……..…

Authorised by…… Date……

*** NB if requesting CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 or over, the child's authority or consent must be obtained except in circumstances where that would clearly be inappropriate and the lawful reasons to provide to the parent(s) outweigh the privacy considerations of the child.**