CCTV Policy

1. Introduction

Bingley Grammar School uses closed circuit television (CCTV) images to reduce crime and monitor the entrance to the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to deter the loss or damage to school property.

The system comprises a number of fixed cameras.

The CCTV system and some of the cameras have audio recording capabilities but audio is disabled by default on all recordings.

The CCTV system is owned and operated by the school and the deployment of this is determined by the school's leadership team.

The CCTV is monitored by the IT Staff, Site Manager, senior leadership team and pastoral staff

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

The school's CCTV Scheme is registered with the Information Commissioner under the terms of the GDPR 2018. The use of CCTV and associated images is covered by GDPR 2018. This Policy outlines the school's use of CCTV and how it complies with the Act.

All authorised operators and employees with access to images must read this policy and be aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the school data controller in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images. See Appendix C

2. Statement of Intent

The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

The Code of Practice is published at: https://ico.org.uk/media/1542/cctv-code-of-practice.pdf

CCTV warning signs will be clearly and prominently placed at all external entrances to the school, including school gates if coverage includes outdoor areas. In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

3. Siting the Cameras

Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

Details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring are listed in Appendix D.

4. Covert Monitoring

The school may in exceptional circumstances set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from the Headteacher and reported to the Chair of Governors

Covert monitoring will cease following completion of an investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example directly viewing toilets.

5. Storage and Retention of CCTV images

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. Currently images are stored in the CCTV system for a maximum of 28 days. See Appendix E for retention details of images.

All retained data will be stored securely.

6. Access to CCTV images

Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

7. Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

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

The school will respond to requests within 1 calendar day of receiving the written request and fee.

An admin fee of £10 will be charged per request.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

8. Access to and Disclosure of Images to Third Parties

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police, service providers and the CCTV Maintenance Company to the school where these would reasonably need access to the data (e.g. investigators).

Requests should be made in writing to the Head Teacher.

The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

9. Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Head Teacher in the first instance.

Further Information

- Further information on CCTV and its use is available from the following: CCTC Code of Practice Revised Edition 2022 (published by the Information Commissioner's Office)
- www.ico.gov.uk
- Regulations of Investigatory Powers Act (RIPA) 2000
- Data Protection Act
- Human Rights Act 1998
- Freedom of Information Act 2000
- Protection of Freedoms

Originator: R1P, S4S
Ratified by Governing Body
Date of policy: February 2025
Date of next review: February 2028

Appendix A - Checklist

This CCTV system and the images produced by it are controlled by the Head Teacher who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998).

Bingley Grammar School has considered the need for using CCTV and has decided it is required for the prevention and detection of crime and for protecting the safety of pupils, staff and visitors. It will not be used for other purposes.

Action to be undertaken	**Checked**
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Yes
There is a named individual who is responsible for the operation of the system.	Yes
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	Yes
Staff and members of the school community will be consulted about the proposal to install CCTV equipment.	Yes
Cameras have been sited so that they provide clear images.	Yes
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Yes
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	Yes
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.	Yes
Except for law enforcement bodies, images will not be provided to third parties.	Yes
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.	Yes

Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes

Appendix B – CCTV Signage

It is a requirement of the GDPR 2018 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.



Appendix C - CCTV Code of Practice - Access

Recorded footage and the monitoring equipment will be securely stored in a restricted area (A Block Server Room). Access to this room is by the IT Department or Operations Manager.

Access to the CCTV system and stored images will be restricted to the IT Department, Operations Manager or Head Teacher.

When accessing images two authorised members of staff must be present. This can be an Authorised User and the person requesting access.

Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

In relevant circumstances, CCTV footage may be accessed:

- By the police when required by law to make a report regarding the commission of a suspected crime; or
- Following a request by the police when a crime or suspected crime has taken plac

when it is suspected that illegal/anti-social behaviour is taking place on School's property, or

- To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the IT Department, Operations Manager or Head Teacher in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- To data subjects (or their legal representatives), pursuant to a Subject Access Request or
- To individuals (or their legal representatives) subject to a court order.
- To the school insurance company where the insurance company requires the same in order to pursue a claim for damage done to the insured property.

Appendix D - CCTV Camera Location

Area	View	Camera No'
Perimeter	Cobbled Drive	158
	Site Office	31
	Bunker path	22
	Patterson Picnic Area	114
	Cemetery Wall (Bottom)	16
	Cemetery Wall (Up)	39
	Cemetery Wall (Top)	48
	Pavilion	42
	Canteen skips	156
	Rear Sports Hall	43
	Sports Centre Corner	118
	Rear Track	50
	Fields	83
	Rear Drive/Parking Area	65
	Rear Drive Upper	155
	BSU/IU Entrance	64
	Rear Drive middle	153

	Staff Vehicle Gate	73
	Pool Rear Drive	21
	Bus Turnaround	159
	Q Block Rear	102
	Front of School	23
	Main Drive	24
	Student Entrance	103
Fields	Fields	83
	Top Field 1	111
	Top Field 2	126
	Bottom Field 1	117
	Bottom Field 2	116
Admin	Reception	1
	Reception Internal	130
	Admin Corridor	145
	Student Reception	49
	Student Reception	113
	Admin Corridor	2
	Boys WC Landing	6
	HR Corridor	80
	B/G Canopy End	144
	Admin Stairwell Ground Floor	125
	Admin Stairwell	78
	Admin Stairwell First Floor	123
	Int - 31 (admin first floor)	69
	A Block - A9	124
	Staff Room Link	127
B/G Corridor	B/G - G7	137

	B/G - G8	128
	BG Corridor English	79
	Staff room link corridor	127
	B/G Landing	143
	G Landing	8
	Achievement Centre	57
	G/PE End	9
	BG Link Corridor	55
N Block	Courts Corridor	15
	N Drinks	11
	N Corridor	10
	Art Office/N6	136
	N6	119
	N6 (2)	142
	AC entrance	71
	N5	59
	Study Hall Lift	86
	SEN Stairwell	85
	N2/N3 Corridor	138
	Int - 32 (N block stairwell)	70
	N Landing	19
	N4/N5 corridor	146
	Stairwell	76
	Study Hall1	61
	Study Hall2	60
	Fiction	75
	Library	74
P Block	INT-39 (link Corridor)	54

	INT-29 (P Block first floor)	67
	INT-30 (P Block second floor)	68
	INT-4 (P Block Stairwell)	4
	P Block Fire Exit	82
	P Block Rear Stairs LG Floor	53
	P Block Inner	5
	INT-35 (P Block Staircase)	52
Sixth Form	Hills	45
	Sixth Form area 1	77
	6th Form Bistro	121
	6th Form	14
	Sixth Form Area 2	56
	Hills Vending	90
	Hills First Floor	89
	Hills Stairwell	129
	INT-28 (6th form boys toilet foyer)	66
Quinn & L BLock	Quinn Outside Area	115
	Quinn Block Entrance	88
	Q Corridor	101
	BSU Future Focus Classroom	87
	L Block Stairwell	131
	Upper L Corridor	147
	Science Block Stairs	58
	L Block Entrance	141
	L16 Landing	134
	L block stairwell	151

Sports Centre	Gym Foyer	38
	Sports Changing	13
	Sportshall back	163
	Exercise Room	17
	Sports Hall	99
DT, Canteen & Coach House	Canteen Entrance	98
	Canteen Queue	139
	Canteen Fridges	63
	FFC	152
	Canteen Tills	93
	Canteen Exit	92
	DT T1	95
	DT Tech Office	133
	T Block Foyer	18
	DT Fire Exit	96
	DT First Floor	97
	T Block Entrance	33
	BSU Classroom	62
	BSU entrance	64
L Yard	L5 Canopy	81
	Canopy L6	91
	L Yard Down	34
	L Yard Middle	104
	L Yard Bottom	27
	L Block stairwell	151
	Pool Path	51
	Boys toilet yard	157
	Repro Yard	30

T Yard	T Block Yard	25
	Canteen Entrance	112
	T Steps	26
	T Yard Lower	110
	Pod Queue	109
	T Block Entrance	33
	L7/L8 Tunnel	107
	T Yard Down	29
	T Yard Upper	108
	T Yard Top	35
	Hills	45
	D Block Yard	12
	L8 Picnic Area	106
	Black Hole	36
	Black Hole Area	84
	Gym Path	94
	Gym Wall	41
	Black Hole Centre	3
Mugga	Courts Start	37
	Courts End	46
D Block	D8 D Entrance	132
	D11/D12 Landing	135
	Geography Entrance	140
	D3/D4 Landing	150
	History Entrance	148
	D7/D8 Landing	149

Appendix E - CCTV Retention Details.

- CCTV footage is stored on the dedicated CCTV server for a period of approximately 31 days and can only be accessed by designated users. After this period the CCTV automatically records over the images with current images.
- Images and video footage can be requested for downloading (hard copy or USB Drive) by a member of staff or an outside body to aid an investigation. This footage will be kept for a period of 31 days and then destroyed.
- Images and video footage can be downloaded into a dedicated file which can be found on the school drive: -

Drive V: Information: CCTV: dedicated user name

Only staff that have requested the CCTV images or video footage can access the file. These images will be stored for a period of 31 days unless the investigation takes longer than this period, but then must be destroyed once the investigation has been completed.