



ELTHAM COLLEGE
FAMILY OF SCHOOLS

CCTV Policy Statement

For the Eltham College Family of Schools

Last reviewed: August 2026



Version Control Information

Reason For Amendment	Name	Date	Main Changes
New policy for Family of Schools	Bursar	July 2025	New policy statement applying to the Family of Schools
Annual Review	Bursar	August 2026	Enhanced policy to align with ISBA guidance, strengthening governance, access controls, disclosure procedures, staff training, retention, monitoring and legal compliance requirements.



1. Purpose

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) systems operated by the Eltham College Family of Schools, including Eltham College (Senior and Junior Schools) and Blackheath Prep.

This policy also serves as a notice and guide to data subjects, including pupils, parents, staff, volunteers, contractors, visitors and members of the public, regarding how personal data collected through CCTV is processed.

The Eltham College Family of Schools acts as the Data Controller for all CCTV systems under its ownership and management.

The School will regularly review the use of CCTV to ensure that it remains necessary, proportionate and effective in achieving its intended purposes. Prior to installing new surveillance systems or significantly extending existing systems, the School will undertake a Data Protection Impact Assessment (DPIA).

2. Our Commitment

The Eltham College Family of Schools uses CCTV to help protect pupils, staff, visitors and property. CCTV supports our commitment to maintaining a safe, secure and respectful environment while balancing security needs with the privacy rights of individuals. The School operates its CCTV systems in accordance with data protection legislation and recognised good practice guidance.

Images captured through CCTV constitute personal data and will be processed fairly, lawfully, transparently and securely.

3. Why We Use CCTV

CCTV is used to:

- Ensure the safety and welfare of pupils, staff and visitors.
- Deter, detect and investigate crime, vandalism and antisocial behaviour.
- Support safeguarding responsibilities.
- Monitor the security and integrity of School premises.
- Protect school buildings, vehicles and personal property.
- Support investigations into disciplinary, safeguarding or security incidents.
- Assist in resolving complaints, grievances and disputes.
- Assist insurers where evidence is required for claims.
- Assist law enforcement agencies where legally appropriate.
- Monitor site arrivals, departures, deliveries and vehicle movements.

CCTV footage is not used for marketing, profiling or automated decision-making.



4. Where Cameras Are Located

CCTV cameras are positioned in locations where the School has identified a legitimate need for monitoring, including:

- Entrances and exits.
- Car parks.
- Pedestrian walkways.
- Corridors and communal areas.
- IT facilities.
- Sports facilities.
- Outdoor play areas.
- Playing fields.
- Parent drop-off and collection areas.

CCTV is never installed within toilets, changing facilities, medical treatment rooms or other areas where individuals would reasonably expect privacy.

Cameras may be located adjacent to entrances of such areas where necessary for safeguarding or site security.

The School seeks to minimise monitoring of neighbouring properties and public spaces. Any incidental monitoring will be limited to what is reasonably necessary for the legitimate purposes identified within this policy.

Clear and prominent signage is displayed at site entrances and other appropriate locations.

5. How We Manage CCTV Footage

Operation

The CCTV system operates continuously throughout School sites.

The School has identified and authorised specific members of staff whose duties require access to CCTV systems or footage.

Security

Footage is stored securely using appropriately protected systems and is accessible only to authorised personnel.

Viewing of footage will take place only in secure environments and strictly for authorised purposes.

Retention

Footage will normally be retained for 28 days and then automatically deleted unless:



- Required for an ongoing investigation.
- Required for safeguarding purposes.
- Required by law.
- Required in connection with legal proceedings or insurance claims.

Training

Staff authorised to access CCTV footage will receive appropriate training covering:

- Data protection obligations.
- Secure handling of footage.
- Disclosure procedures.
- Subject Access Requests.
- Safeguarding responsibilities.

Maintenance

The School will ensure CCTV systems are inspected, tested and maintained regularly to ensure they remain operational and fit for purpose.

6. Access Requests and Disclosure

Individuals may request access to footage containing their personal data by submitting a Subject Access Request to the Bursar.

Requests should provide:

- Date.
- Time.
- Location.
- Description of the individual.
- Details of the incident where relevant.

Proof of identity may be required.

Access rights are subject to applicable legal exemptions, including where disclosure would adversely affect the rights and freedoms of others.

Where appropriate, footage may be redacted or individuals may be invited to view footage on School premises.

The School may disclose CCTV footage where appropriate:

- To the police.
- To local authorities.
- To safeguarding agencies.



- To insurers.
- To legal advisers.
- Pursuant to legal obligations.

All disclosures and access to footage will be appropriately recorded.

7. Other CCTV Systems

The School does not own or manage third-party CCTV systems but may receive footage from such systems where this supports the objectives of this policy, safeguarding obligations, School Rules or legitimate investigations.

Students may travel on vehicles provided by external contractors and public service operators that operate CCTV systems. Where appropriate and lawful, the School may request access to such footage to assist in investigating behavioural, safeguarding or security matters.

8. Covert Surveillance

The School does not routinely undertake covert surveillance.

Covert monitoring will only be considered in exceptional circumstances, where there are reasonable grounds to suspect serious misconduct or criminal activity and where overt monitoring would be likely to prejudice an investigation.

Any decision to undertake covert monitoring must be authorised by senior leadership, supported by a documented assessment and conducted in accordance with applicable law and guidance.

9. Legal Compliance

The CCTV system is operated in accordance with:

- UK General Data Protection Regulation (UK GDPR).
- Data Protection Act 2018.
- Education (Independent School Standards) Regulations 2014.
- ICO Video Surveillance Guidance.
- ICO Data Protection Guidance.

The School's use of CCTV also supports safeguarding responsibilities in accordance with statutory guidance.

This policy should be read alongside the School's Data Protection Policy, Privacy Notices, Safeguarding Policy and relevant staff procedures.



10. Who to Contact

Questions, complaints, Subject Access Requests and requests relating to CCTV should be directed to the Bursar: **bursar@eltham-college.org.uk**