



CCTV Policy

Trinity School

1. Introduction

Trinity School is a boarding school that uses closed circuit television (CCTV) images to provide a safe and secure environment for pupils (including boarders), staff and visitors, both during and outside the school day. This includes protecting the school buildings, boarding houses and internal infrastructure (including out of term time), supporting the School's safeguarding responsibilities for boarding pupils, improving pupil behaviour and reducing vandalism, and providing assistance in the detection and prevention of crime.

The system comprises 20 fixed cameras. All cameras are overt (clearly visible) and none are concealed. Cameras are sited to cover site entrances, communal circulation areas, car parks, the site perimeter and the external entrances to boarding houses. Recording is motion-activated, so cameras record only when movement is detected within their field of view rather than continuously, and images are transmitted to and stored on a digital video recorder (DVR). We do not record audio through the CCTV system although this capability is there on the cameras.

The CCTV system is owned and operated by the school. Any future changes to the CCTV system or its capacity will be notified to parents/carers, pupils, and staff.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the school in their responsibilities under the ICO's CCTV Code of Practice, to which the school subscribes. All employees are aware of the restrictions in relation to access to and disclosure of recorded images.

The number of authorised operators and employees with access to the images is very tightly restricted. Live images may be viewed, out of public sight in the main office, by a member of the office team and by the Senior Leadership Team (SLT); this is not visible or accessible to pupils, parents or other visitors passing through the office. Access to it, and to recorded images, is restricted to authorised staff and is password protected.

Statement of Intent, Rationale and Purpose

The School complies with the Information Commissioner's Office (ICO) CCTV Code of Practice and follows the Surveillance Camera Commissioner's Passport to Compliance, to ensure CCTV is used responsibly and safeguards both trust and confidence in its continued use.

CCTV warning signs will be clearly and prominently placed at the school's main vehicle and pedestrian entrances and at boarding house entrances. The school will ensure that there are prominent signs placed at both the entrance to the CCTV zone and within the controlled area.

The planning and design of the CCTV system has endeavoured to ensure that it 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.

Sitting of Cameras

Cameras have been sited so that they only capture images relevant to the purposes for which they were installed (see above), and care has been taken to ensure that reasonable privacy expectations are not violated. As this is a boarding school, particular care has been taken with camera placement given that pupils, including boarders, live on site. The School will ensure that the location of equipment is carefully considered so that images captured comply with data protection law.

The School will make every effort to position cameras so that their coverage is restricted to school premises, which may include outdoor areas. There is no intention to cover public spaces, and the School follows the guidance set out in the Surveillance Camera Commissioner's Passport to Compliance and the Surveillance Camera Code of Practice. CCTV will not be used in classrooms but in areas that are less easily monitored by other means and where experience suggests incidents of the kind being monitored are more likely to take place. Because Trinity is a boarding school, no cameras are located inside boarding house bedrooms, dormitories, bathrooms, changing rooms or other areas where a heightened expectation of privacy applies, and no cameras are aimed at private residential accommodation. Members of staff are aware of fixed camera locations.

Storage and Retention of CCTV Images

Motion-activated recordings are retained for 24 hours and are then automatically deleted, unless a recording is required as part of an incident, in which case the relevant footage is extracted and archived for the duration of the investigation, or for 12 months, whichever is shorter. This retention period is reflected in the School's Data Retention Policy. 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. All retained data will be stored securely and access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available.

Data Subject Access Requests

Individuals have the right to request access to CCTV footage relating to themselves, under data protection law. All requests must be made in writing to the Headteacher using a signed data release form. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage being requested, to be identified e.g. time, date and location.

The School will respond to such requests within 30 calendar days of receiving the written request. The School reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals, give rise to safeguarding concerns or jeopardise an ongoing investigation.

Access to and Disclosure of Images to Third Parties

There will be no disclosure of recorded data to third parties other than to statutory bodies such as the Police, Fire Brigade Investigators, the Health and Safety Executive, or service providers where these may reasonably require access to the data e.g. the school's CCTV maintenance contractor tracing and

identifying a fault. Requests from the Police must be authorised by an officer of the rank of Sergeant or above, using a WA170 form.

All such Third Party requests should be made in writing to the Headteacher. Recorded images may be used in the school's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

Complaints and Further Information

Complaints and enquiries about the operation of CCTV in the school should be directed to the Data Protection Officer, [DPO name], email: Ajay Gill ajay.gill@alphaschools.co.uk

Further information on CCTV and its use in schools is available from the following:

Security Camera Commissioner's Office -

<https://www.gov.uk/government/organisations/surveillance-camera-commissioner>

Regulation of Investigatory Powers Act (RIPA) 2000 - www.legislation.gov.uk/ukpga/2000/23/contents

General Data Protection Act 2018 - <https://ico.org.uk>

Date of Review	Position	Name of Reviewer	Date of Next Review
August 2026	Headteacher	Kate Unsworth	August 2027
August 2026	Chair of Governors	Ali Khan	August 2027