



Erskine Stewart Melville

1694

CCTV Policy

Responsible: Chief Digital and Transformation Officer

Last Updated: June 2026

Date for Renewal: June 2029

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) System at the Erskine Stewart Melville Schools (“the Schools”). It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the Schools 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 Schools, 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 Schools’ Data Protection policy. For further guidance, please review the Information Commissioner’s CCTV Code of Practice.

The Schools’ reasons for using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the Schools believe 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 pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 1.2 To protect the Schools’ buildings and equipment, and the personal property of pupils, 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 school sites and deliveries and arrivals.
- 1.5 To provide a record of activities in specific areas of the school where there is a justified need, for example in relation to site management and health and safety.

2. Positioning

- 2.1 Locations have been selected, both inside and out, that the Schools reasonably believe require monitoring to address the stated objectives.
- 2.2 Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area, identifying the Schools as the Data Controller and giving contact details for further information regarding the System.
- 2.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- 2.4 No images of public spaces will be captured except to a limited extent at site entrances.

3. Maintenance

- 3.1 The CCTV System will be operational 24 hours a day, every day of the year.
- 3.2 The System Manager (defined below) will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
- 3.3 The System will be checked and (to the extent necessary) serviced no less than annually.

4. Supervision of the System

- 4.1 Staff authorised by the Schools to conduct routine supervision of the System may include janitors, senior guidance staff, supervisors at the sports centres and relevant staff on duty.
- 4.2 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 Security Systems Analyst who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.
- 5.2 Images will be stored for 30 days, and automatically over-written, unless the Schools consider 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 our Data Protection policy.

6. Access to Images

- 6.1 Access to stored CCTV images will only be given to authorised persons, with the approval of the System Manager, in pursuance of the above objectives (or if there are other overriding and lawful reasons to grant such access).
- 6.2 Individuals also have the right to access personal data the Schools hold on them (please see the Privacy Notice), including information held on the System, if it has been kept. The Schools will require specific details including at least the time, date and camera location before they 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 himself/herself with regard to 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, the Police or some relevant statutory authority
 - 6.3.2 To make a report regarding suspected criminal behaviour
 - 6.3.3 To enable the Child Protection Co-ordinators or their appointed deputies to examine behaviour which may give rise to any reasonable safeguarding concern
 - 6.3.4 To assist the Schools in establishing facts in cases of unacceptable pupil behaviour, where it is considered necessary and proportionate to do so. Where a pupil is directly involved in a serious incident, parents or guardians will be informed in line with the Schools' procedures for managing such matters.
 - 6.3.5 To data subjects (or their legal representatives) pursuant to an access request under the Data Protection Act 2018 and on the basis set out in 6.2 above
 - 6.3.6 To the Schools' insurance company where required in order to pursue a claim for damage done to insured property, or
 - 6.3.7 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).

7. Other CCTV Systems

- 7.1 The Schools do 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 Schools' own CCTV policy and/or its school rules.

8. Complaints and Queries

Any complaints or queries in relation to the Schools' CCTV system, or its use of CCTV, or requests for copies, should be referred to dpo@esms.org.uk.

CCTV FOOTAGE ACCESS REQUEST

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

(Please note that CCTV footage may contain the information of others that needs to be protected, and that the Schools typically delete CCTV recordings after 30 days.)

Name and address:

(proof of ID may be required)

Description of footage (including a description of yourself, clothing, activity etc.):

Location of camera:

Date of footage sought:

Approximate time (give a range if necessary):

Signature*.....

Print Name.....

Date *

N.B. If requesting CCTV footage of a child under 12, a person with parental responsibility should sign this form. For children 12 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