Halliford School
SHEPPERTON

CCTV Policy

September 2026

Approved by the Governing Body September 2026

About this Policy

Halliford School (the **School**) uses CCTV cameras to view and record pupils, parents, staff and visitors on and around our premises. We recognise that the images of individuals recorded by CCTV cameras are personal data which must be processed in accordance with data protection laws.

The purpose of this policy is to:

- outline why and how we will use CCTV, and how we will process personal data recorded by CCTV cameras.
- ensure that the legal rights of our pupils, parents, staff and visitors relating to their personal data are recognised and respected; and
- assist staff in complying with relevant legal obligations when working with personal data.

The CCTV system is managed by the School, which is the controller in respect of personal data collected by our CCTV cameras. The outsourced IT company Sensible IT Solutions administer the system on behalf of the School. If you have any questions about this policy, please contact the Bursar, bursar@hallifordschool.co.uk

This policy will be subject to review from time to time and should be read with reference to the School's Privacy Notice. We will also review the ongoing use of existing CCTV cameras regularly to ensure that their use remains necessary and appropriate, and that the system is continuing to address the needs that justified its introduction.

Objectives

The School's purposes for using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the School believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

- To protect pupils, parents, staff and visitors with regard to their personal safety and to act as a deterrent against crime.
- To protect the School buildings and equipment, and the personal property of pupils, parents, staff and visitors from damage, disruption, vandalism and other crime.
- To prevent and detect crime, and support law enforcement bodies in the prevention, detection and prosecution of crime as well as the identification and apprehension of offenders.
- To monitor the security and integrity of the School site and deliveries and arrivals, including car parking and access gates.
- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the School's rules, which are available to parents and pupils on request.
- To assist in day-to-day management, including ensuring the health and safety of pupils, parents, staff and visitors.
- To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
- To assist in civil litigation, including employment tribunal proceedings.

Please note that this list is not exhaustive and other purposes may become relevant from time to time.

Positioning

Locations for the CCTV cameras have been selected, both inside and outside our premises, that the School reasonably believes require monitoring to address the above objectives. The list of cameras inside and outside are as follows:

External Cameras	Internal Cameras	Internal Cameras
Main Gate – Russell Road	PC Centre	Peter Jones Centre & Sports
Reflection Garden	6th Form 1	Sports Changing corridor 1 & 2
Bag Area - Courtyard	6th Form 2	Sports Fitness Balcony
Bag Area – Baker	6th Form Booths	Boys Toilet Doorway
Bike Shed – Baker	6th form Café Counter	Sports Hall 1 & 2
Bins - Baker	6th Form Café Main	Forum & Dining Room
Baker Car Park	P01 Design Suite	Dining Room 1 & 2
Student Pedestrian Gate	P02 Classroom	Dining Room Counter
Cottage Car Park	P11 Design & IT Suite	Canteen Rear – Servery
Basketball Court	PC Front Lobby & External Door	DT
Courtyard	PC Back Lobby & External Door	Workshop 1.1 & 1.2
Main Door Front Car Park	P13 – Art 1	Workshop 2.1 & 2.2
Hardcourt between PC / Sport	P14 – Art 2	
LRC External 1	P14 – Storage	
LRC External 2	P14 – Art 4	
Rear Gate – Wadham Close	P14 – Art 5	
WW / Sports Hall Gap	P14 – Art 6	
Drama Studio & G4 Entrance	P22 – MAC Suite	
Forum Under canopy	Baker Building	
Walkway between Forum & House	B13 – IT	
Rear Sports Door across to Woodward	B15 – IT Door and Rear	
Staff Car Park from archway	Baker Toilet Door	
	Baker Corridor Ground Floor	
	Woodward	
	LRC	
	LRC Front Lobby & External Door	
	LRC Back Lobby & External Door	
	LRC Main	
	WW Stairwell – 1st Floor	
	WW Stairwell – Lift 1	
	WW Stairwell – 2nd Floor	
	WW Stairwell – Lift 2	
	WW Corridor – 1st Floor – 1 & 2	
	WW Corridor – 2nd Floor – 1 & 2	

Adequate signage has been placed in prominent positions around the premises to inform pupils, parents, staff and visitors that they are entering a monitored area.

These locations have been chosen to minimise viewing of spaces not relevant to the legitimate purposes of the School's monitoring. As far as practically possible, CCTV cameras will not focus on private property; and no images of public spaces will be captured except to a limited extent at site entrances. In addition, surveillance systems will not be used to record sound, and no images will be captured from areas in which individuals would have a heightened expectation of privacy, including medical, changing and washroom facilities.

Maintenance

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

Authorised personnel (Sensible IT Solutions) will check and confirm that the CCTV system is properly recording and that cameras are functioning correctly, on a regular basis.

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The CCTV system will be checked and (to the extent necessary) serviced no less than annually.

Supervision

We will ensure that recorded images are only viewed by approved members of staff whose roles require them to have access to such data. This may include Headmaster, Bursar and safeguarding / pastoral staff. Staff using the CCTV system will be given appropriate training to ensure that they understand and observe the legal requirements related to the processing of relevant data[1].

Images will only be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

Storage

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered by CCTV cameras is stored in a way that maintains its integrity and security. Given the large amount of data generated by the CCTV system, we store video footage on the NVR locally.

Images will be stored for 60 days, and will be overwritten when the system is full.

Requests for disclosure

Individuals have the right to request access to personal data that the School holds about them (otherwise known as a "subject access request", on which please see the School's Privacy Notice, including information collected by the CCTV system, if it has been retained.

In order to respond to a subject access request, the School will require specific details including (as a minimum) 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.

The School must also be satisfied as to the identity of the person wishing to view stored images and the legitimacy of their request.

No images from our CCTV cameras will be disclosed to a third party without express permission being given by the School. The following are examples of circumstances in which the School may authorise disclosure of CCTV images to third parties:

- Where required to do so by the police or any relevant local or statutory authority.
- To make a report regarding suspected criminal behaviour or a safeguarding incident.
- To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern.
- To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the pupil's parents/guardian will be informed as part of the School's management of a particular incident.
- To individual data subjects (or their legal representatives) pursuant to a subject access request (as outlined above);
- To the School's insurance company where required in order to pursue a claim (for example for damage to insured property); or
- In any other circumstances required under law or regulation.

Where images are disclosed, 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).

The School reserves the right to obscure images of third parties when disclosing CCTV footage, where we consider it necessary to do so.

Complaints and queries

Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Bursar. bursar@hallifordschool.co.uk

For any other queries concerning the use of your personal data by the School, please see the School's applicable Privacy Notice.

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CCTV FOOTAGE ACCESS REQUEST

The following information is required before the school 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 school typically deletes CCTV recordings after [x] period.

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 ……..

*** NB if requesting CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 and 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.**

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