

CCTV Policy

Applies to:

- All staff (teaching and non-teaching), the directors and volunteers working in the School;
- Pupil, Parents, Guardians and Caregivers and Prospective Pupils;
- Visitors and Contractors.

Availability:

This policy is made available in the following ways:

- The School's website www.radnor-sevenoaks.org;
- Via Teams, All Staff Shared Documents, Compliance, Policies;
- On request a copy may be obtained from the School's Office.

Monitoring and Review:

- This policy will be subject to continuous monitoring, refinement and audit by the Head.
- The Board of Directors undertake a formal annual review of this policy.

Signed:



David Paton
Head



Ian Davies
Chairman of the Board of Directors

Reviewed: September 2025
Next Review: September 2026

1. About this Policy

- 1.1. Radnor House Sevenoaks (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.
- 1.2. 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.
- 1.3. A breach of this policy may, in appropriate circumstances, be treated as a disciplinary matter. Following an investigation, a breach of this policy may be regarded as misconduct, leading to disciplinary action.
- 1.4. The CCTV system is administered and managed by the School, in respect of personal data collected by our CCTV cameras. If you have any questions about this policy, please contact the Compliance Officer, Rachel Nemchand, by email at rnemchand@radnor-sevenoaks.org.
- 1.5. This policy will be subject to review from time to time and should be read with reference to the School's Data Protection Policy. 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.

2. Objectives

- 2.1. 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.
 - To monitor staff and contractors when carrying out work duties.
 - To monitor and uphold discipline among pupils in line with the School's code of conduct, 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.
- 2.2. Please note that this list is not exhaustive and other purposes may become relevant from time to

time.

3. Positioning

- 3.1. 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. See Appendix B: Camera Location.
- 3.2. 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, identifying the School as the controller operating the CCTV system and including contact details for further information regarding the CCTV system.
- 3.3. 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.

4. Maintenance

- 4.1. The CCTV system will be operational 24 hours a day, every day of the year.
- 4.2. The IT team will check and confirm that the CCTV system is properly recording and that cameras are functioning correctly, on a regular basis.
- 4.3. The CCTV system will be checked and (to the extent necessary) serviced annually. This is arranged by the IT Team.

5. Supervision

- 5.1. We will ensure that recorded images are only viewed by approved members of staff whose roles require them to have access to such data. 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.
- 5.2. 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.

6. Storage

- 6.1. 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. Data is stored in a portal called Synology Portal, which is a cloud provider and will not be stored on any other device. We will take all reasonable steps to ensure that the provider maintains the security of our information, in accordance with industry standards. We may also engage data processors to process data on our behalf. We will ensure appropriate contractual safeguards are in place to protect the security and integrity of the data.
- 6.2. Images will be stored for 30 days, and the system will override its own data, unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required to retain such data (for example, by an appropriate third party such as the police or local authority).
- 6.3. Where personal data collected by the CCTV system is retained, it will be held in accordance with data protection law and our Data Protection Policy.

7. Requests for disclosure

- 7.1. 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 and Data Protection Policy for further information, including information collected by the CCTV system, if it has been retained.

- 7.2. 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.
- 7.3. The School must also be satisfied as to the identity of the person wishing to view stored images and the legitimacy of their request.
- 7.4. 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 the 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/guardians 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.
- 7.5. Where images are disclosed, a record will be made in the CCTV log 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).
- 7.6. The Log is accessed and managed by the IT Team.
- 7.7. The School reserves the right to obscure images of third parties when disclosing CCTV footage, where we consider it necessary to do so.

8. Complaints and queries

- 8.1. 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 Compliance Officer, Rachel Nemchand, by email at rnemchand@radnor-sevenoaks.org.
- 8.2. For any other queries concerning the use of your personal data by the School, please see the School’s applicable Privacy Notice.

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 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

* NB if requesting CCTV footage of a child under the age of 12, a person with parental responsibility should sign this form. For children over that age, 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.

Appendix A: CCTV Locations

Location	Internal/External	Operational Hours
Sports Locker (outside) 1	External	24 Hours
Sports Locker (outside) 2	External	24 Hours
Sports Locker (outside) 3	External	24 Hours
Sports Locker (outside) 4	External	24 Hours
Sports Locker (outside) 5	External	24 Hours
Sports Locker (outside) 6	External	24 Hours
Sports Locker (outside) 7	External	24 Hours
Dining Hall Lockers	Internal	24 Hours
Parent Car Park 1	External	24 Hours
Parent Car Park 2	External	24 Hours
Parent Car Park 3	External	24 Hours
Front of School	External	24 Hours
Prep Entrance	External	24 Hours
Tennis Court	External	24 Hours
Sports Grass	External	24 Hours
Turning Circle	External	24 Hours
Driveway 1	External	24 Hours
Driveway 2	External	24 Hours
STEM entrance	External	24 Hours
Sports Entrance	External	24 Hours
Side Lawn	External	24 Hours
Rear Lawn 1	External	24 Hours
Rear Lawn 2	External	24 Hours
Staff Car Park	External	24 Hours