EF ACADEMY

International
Boarding Schools

OXFORD CCTV POLICY

Document title:	CCTV Policy
Date Created:	May'19
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Individuals Involved in Developing the Document:	Head of School (Paul Ellis) Operations Manager (Nelli Williams) Campus Manager (Emma Clarke) Mark Fletcher-Single (Deputy Head)
Document Purpose:	The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at EF Academy Oxford
Related Documents:	Safeguarding Policy Working Together to Safeguard Children December 2023 (DfE) Keeping Children Safe in Education September 2023 (DfE) Data Protection Act 2018 Protection of Freedoms Act 2012 Data Protection-Retention Periods Policy GDPR Staff fact sheet Health & Safety Policy Anti-bullying Policy Complaints Policy Crisis Management Plan Missing Persons Procedure Searching & Confiscation Policy Boarding Schools: National Minimum Standards to reflect the recent consultation period's outcome of 'Raising expectations of privacy'
Date of Next Review:	August 2027
Recent Updates:	Following advice from Barbara Lewin's safeguarding training (Nov 20), a number of updates have been included Aug.'21 (Mark Fletcher-Single) developed policy to reflect the School's current leadership restructure and the inclusion of ILC's Dec.'20 CCTV Policy Sept.'22 (Mark Fletcher-Single): - reviewed to reflect the School's continued leadership restructure during academic yr. Aug.'22 to Jul.'23 - reviewed to reflect the changes to National minimum standards for boarding schools (from 5th Sept.'22), specifically, NMS 4.8. - reviewed to reflect change of DSL roles and updates to staff changes and changes to KCSiE in Sept.'22 Jul.'23 (Mark Fletcher-Single) updated policy with some new wording and formatting, and to reflect the School's continued leadership restructure May'24 (Mark Fletcher-Single) updated policy following inclusion of Protection of Freedoms Act 2012 to related documents (specifically, rewording paragraphs under Purpose subheading) and updating ILC's Jan.'24 CCTV Policy

Purpose
The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at EF Academy Oxford, Cotuit Hall, Pullens Lane, Oxford ("the School"). It also serves as a notice and a guide to data subjects (including students, parents, staff, volunteers, visitors to the School 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 School. The School's the data controller is the Deputy Head of School and Health & Safety Officer. This policy will be subject to review from time to time and should be read with reference to the School's Data Protection-Retention Periods Policy and GDPR Staff fact sheet. For further guidance, please review the Information Commissioner's CCTV Code of Practice. Students will be informed of our use of CCTV prior to arriving on campus and again when they arrive. If students are aged under 18, the parent who signed the contract sending the U18 needs to know about the cameras and agree to their child's image potentially / probably being caught on camera. Therefore, parents must be told about cameras before booking: it is clearly stated in our Terms & Conditions documents (signed by parents).

EF Academy Oxford has a statutory responsibility for the protection of its property, equipment and other plant as well providing a sense of security to its employees, students and visitors to its premises. EF Academy Oxford owes a duty of care under the provisions of Data Protection Act 2018 and associated legislation and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance. The purpose, to enhance the quality of life of the school community by integrating the best practices governing the public and private surveillance of its premises. The School is registered with the Information Commissioner Office and will seek to comply with the requirements relating to Data Protection. The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring normal employee activity or performance. If a CCTV camera has recorded a specific incident under investigation, recordings may be used in both student and staff investigatory and potentially disciplinary proceedings to provide evidence as appropriate.

Any requests for CCTV recordings / images from Police will be fully recorded and legal advice will be sought if any such request is made. If a law enforcement authority, such as Police, is seeking a recording for a specific investigation, Police may require a warrant and accordingly any such request made by Police should be requested in writing and the School will immediately seek legal advice. CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the School, including the provisions set down in equality and other educational and related legislation. This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc. Video monitoring of public areas for security purposes within School premises is limited to uses that do not violate the individual's reasonable expectation to privacy. All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by EF Academy Oxford. Recognisable images captured by CCTV systems are "personal data". They are therefore subject to the provisions of the Data Protection Act 2018.

All fixed cameras are in plain sight on school premises and the School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds. The School's purposes of 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.

Objectives of the System
1. To protect students, staff, volunteers, visitors and members of the public with regard to their personal safety.
2. To protect school buildings and equipment, and the personal property of students, staff, volunteers, visitors and members of the public.

3. To support the Police and community in preventing and detecting crime and assist in the identification and apprehension of offenders.
4. To monitor the security and integrity of the school site and deliveries and arrivals.
5. To monitor staff and contractors for compliance related to employment and contractual obligations.
6. To monitor and uphold discipline among students in line with the school rules and EF Academy Oxford's Behaviour Policy (which are available to parents and students).

Positioning
7. Locations have been selected, both inside and out, the School reasonably believes require monitoring to address the stated objectives (see Appendix 1).
8. Adequate signage has been placed in prominent positions to inform staff and students they are entering a monitored area, identifying the Deputy Head of School and Health & Safety Officer as the Data Controller and giving contact details for further information regarding the system.
9. No images will be captured from areas in which individuals would have a heightened expectation of privacy, including individual's rooms and washroom facilities.
10. No images of public spaces will be captured except to a limited extent at site entrances.

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

Supervision of the System
14. Staff authorised by the School to conduct routine supervision of the System may include the Deputy Head of School, Boarding Lead, boarding team, Deputy Head of School and Health & Safety Officer, the Security team and EF's IT support.
15. 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.

Storage of Data
16. The day-to-day management of images will be the responsibility of the Deputy Head of School and Health & Safety Officer who will act as the System Manager, or such suitable person as the System Manager shall appoint in her or his absence.
17. Images will be stored for 12 days, and automatically over-written unless the School considers 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.
18. Where such data is retained, it will be retained in accordance with the Data Protection Act 2018, Protection of Freedoms Act 2012, and our Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded in the system log book (see Appendix 3).

Access to Images
19. Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
20. Individuals also have the right to access personal data the School holds on them (including information held on the System), if it has been kept. The School will require specific details including at least to time, date and camera location before it can properly respond to any such requests (see Appendix 2). This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.
21. The System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are e.g.s. when the System Manager may authorise access to CCTV images:

21.1. where required to do so by the Deputy Head of School, the Police or some relevant statutory authority;

21.2. to make a report regarding suspected criminal behaviour;
21.3. to enable the Designated Safeguarding Lead or her / his appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
21.4. to assist the School in establishing facts in cases of unacceptable student behaviour, in which case, the parents / guardian and relevant admissions office will be informed as part of the School's management of a particular incident;
21.5. 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 21.2 above;
21.6. to the School's insurance company where required in order to pursue a claim for damage done to insured property; or
21.7. in any other circumstances required under law or regulation.

22. Where images are disclosed under 21.2 above, a record will be made in the system log book (see Appendix 3) 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).
23. Where images are provided to third parties under 21.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

Other CCTV systems
24. The School does not own or manage third party CCTV systems, however, may be provided by third parties with images of incidents where this in line with the objectives of the School's own CCTV policy and its school rules.
25. Many students travel on coaches provided by third party contractors and a number of these coaches are equipped with Dash Cam systems. The School may use these in establishing facts in cases of unacceptable student behaviour, in which case the parents / guardian and relevant admissions office will be informed as part of the School's management of a particular incident.
26. Use of surveillance equipment in external rented building (ILC) (see Appendix 4)
Staff and students will be informed of the surveillance equipment within our Cherwell building and possible use is referenced on pre-departure information to young students and their parents as well as upon arrival at the School.
27. Use of surveillance equipment in off-site accommodation
Internal use of any form of surveillance equipment within homestay accommodation is discussed during visits. Following advice from Barbara Lewin safeguarding training (Nov. '20), we consider a camera in such accommodation as a public place and therefore subject to data protection laws.

Complaints and queries
28. 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 Deputy Head of School.

Covert surveillance
29. EF Academy Oxford will not engage in covert surveillance. Where Police requests to carry out covert surveillance on school premises, such covert surveillance may require the consent of a judge. Accordingly, any such request made by Police will be requested in writing and the School will seek legal advice.

Notification (signage)
30. The Deputy Head of School will provide a copy of this CCTV Policy on request to staff, students, parents and visitors to the School. This policy describes the purpose and location of CCTV monitoring, contact details those wishing to discuss CCTV monitoring and guidelines for its use. Adequate signage is placed around campus and adequate signage is prominently displayed at the entrance to Cotuit House (e.g. below).

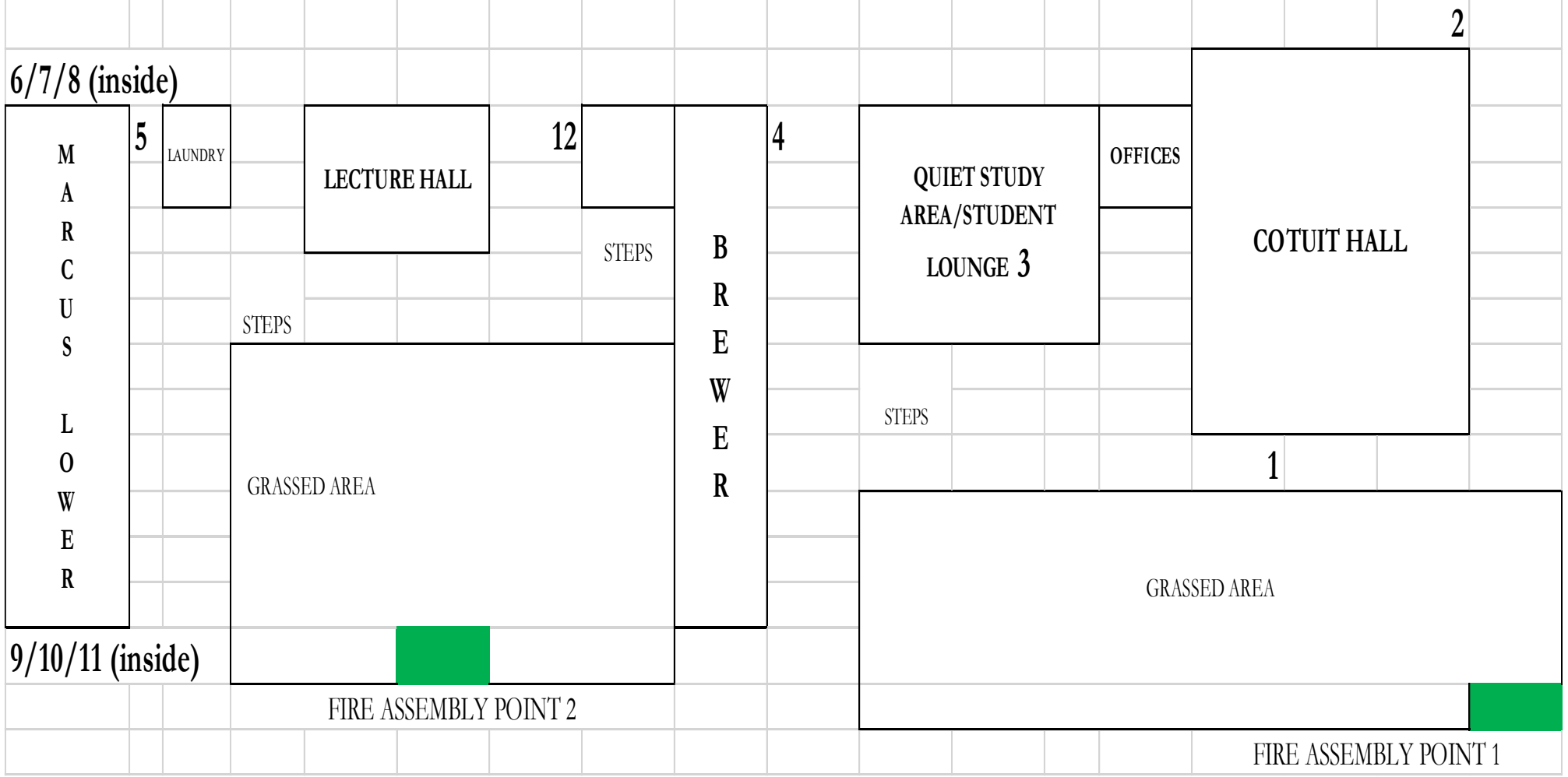

Images are being monitored for the purpose of public safety, crime prevention, detection and prosecution of offenders.
This scheme is controlled by
EF ACADEMY OXFORD, COTUIT HALL, PULLENS LANE, OX3 0DA
For further information contact
MOHAMMAD MAHMOOD, MOHAMMAD.MAHMOOD@EF.COM

Appendix 1 CCTV Locations

CCTV at Cotuit Hall Campus

No.	Camera Location / Name	Purpose of Camera	Impact on Students' Privacy
1	Outside reception / Reception	Help prevent theft and vandalism and to monitor individuals	Low
2	Cotuit House Back / Car park	Help prevent theft and vandalism and to monitor individuals	Low
3	Student Lounge / SL	Help prevent theft and vandalism	Low
4	Outside Brewer Building / Brewer	Help prevent theft and vandalism and to monitor individuals and curfew violations	Low
5	Outside Marcus Lower North / ML Outside	Help prevent theft and vandalism and to monitor individuals and curfew violations	Low
6	Marcus Lower North Foyer / Curfew	Help prevent theft and vandalism and to monitor individuals	Moderate to low
7	Marcus Lower North 1st floor Stairwell / ML North 1st	Help prevent theft and vandalism and to monitor individuals	Moderate to low
8	Marcus Lower North 2nd floor Stairwell / ML North 2nd	Help prevent theft and vandalism and to monitor individuals	Moderate to low
9	Marcus Lower South Foyer / ML South Ground	Help prevent theft and vandalism and to monitor individuals	Moderate to low
10	Marcus Lower South 1st floor Stairwell / ML South 1st	Help prevent theft and vandalism and to monitor individuals	Moderate to low
11	Marcus Lower South 2nd floor Stairwell / ML South 2nd	Help prevent theft and vandalism and to monitor individuals	Moderate to low
12	Back Lane next to Lecture Hall / SA (please note the area is no longer a smoking area)	Help prevent theft and vandalism and to monitor individuals	Low

COTUIT HALL CAMPUS - CCTV LOCATION MAP



Appendix 2 CCTV Footage Access Request Form

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 CCTV footage may contain the information of others that needs to be protected, and that the School typically deletes CCTV recordings after 12 days.

Name and address: (proof of ID may be required)	
Description of footage (including a description of yourself, clothing, activity etc.)	
Location of camera (camera name / no.)	
Date of footage sought	
Approximate time (give a range if necessary)	

Signature*		Date	
Print name			

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

Appendix 3 CCTV Viewing Log

Camera Number	Date	Time	Viewed by	Date viewed image	Time of viewed image	Length of viewed image	Reason	Recorded Y/N with location	Crime number if applicable

ANNEXE 1: ILS CCTV Policy

CCTV Policy

Purpose

- CCTV is required for the following purposes:
    - To provide security for students & staff in our teaching and accommodation facilities
    - To encourage appropriate conduct amongst the school community

- The purpose of this policy is to ensure that surveillance equipment is used and managed appropriately for the purpose which it was intended with respect for individual privacy.

- This policy will ensure staff are sensitive to issues and their responsibilities around use of surveillance equipment.

Procedures:

Data Protection Impact Assessment
EF campuses have identified and documented the potential impact on individuals' privacy and taken this into account when installing and operating CCTV systems. Issues of security and whether the existing CCTV system is required and appropriate are discussed at regular health & safety committee meetings.

Location of equipment
CCTV cameras will be located only in areas where it is considered necessary and with appropriate regard for people's privacy. Cameras will not be sited in locations overlooking non-EF areas such as neighbouring gardens. Internal cameras will not be sited in locations where a greater degree of privacy should be afforded such as bathroom areas.

Governance
This policy will be reviewed annually and shared with users of CCTV. The School Director assumes overall responsibility for the CCTV system.

Requests for personal data
EF is aware that staff, students and visitors have the right to request a copy of their image from CCTV. Staff will refer to the EF Data Protection Policy for information and guidance on requests for personal data, including CCTV images. Requests should be made in writing to the School Director, providing required information to enable footage to be identified. Requests for information will be handled as efficiently as possible, within at least one month of the request. Unless formally requested, images will not be provided to or shared with third parties other than law enforcement bodies to assist them in the detection or prevention of a crime. The school also reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

Training
The School Director will decide which staff should be authorised to have access to the CCTV system, both to operate and view it. Those nominated staff will be trained in how to operate the system and cameras (if applicable) and how to handle requests for CCTV information/images. All staff who are authorised to access

the cameras should be familiar with the system, and with the processes for reviewing footage and extracting it if required. All staff will be made aware of any likely disciplinary penalties for misuse of the CCTV system. Should any external security staff's role require them to monitor CCTV, the school will ensure that appropriate training and access is given. Staff with access to CCTV will be made aware that disciplinary action could be taken against them in the event of incorrect or inappropriate use of images or footage and may be asked to sign an agreement clarifying their responsibilities – see Appendix A *Correct Use of CCTV*.

Data storage and retention
The school will only retain recorded CCTV images for long enough to allow for any incident to come to light (e.g. for a theft to be noticed) and to investigate it. In line with government guidelines, CCTV footage will not be saved for longer than 30 days. Saved images will be stored securely with limited access by appropriate staff only and will be deleted if no longer required.

Data quality
The school will ensure that the CCTV system in use provides CCTV images that are clear and of a sufficient quality to be of use in the event of need. Consideration will also be given to clear and useful images when positioning cameras and maintaining facilities, such as foliage growth and lighting. CCTV systems should be maintained routinely in order to ensure effective functioning and quality. Should the system or any individual cameras fail, required maintenance or replacement will be undertaken as efficiently as possible in order to maintain safety and security for the school or residence community.

Data security
The school securely stores CCTV images, limits access to authorised individuals and regularly checks that the CCTV system is working properly.

Awareness and signage
Signs showing that CCTV is in operation are clearly visible. Where it is not obvious who is responsible for the system, contact details are displayed on the sign(s). Signs are appropriate size and location so that a person is aware that they are being observed, with the purpose of increasing not only awareness but potentially also safety.

Use of surveillance equipment in homestay accommodation
Internal use of any form of surveillance equipment within homestay accommodation is discussed during home visits and possible use is referenced on pre-departure information to young students and their parents. They are given the opportunity to live in a home without such equipment should they wish.

Use of surveillance equipment in external rented buildings
Staff will consult with external suppliers to ensure that an approriate policy and procedures are in place to protect students with regard to taking, using, sharing and storing photos and videos of children. This includes both CCTV systems and any body cams worn by external staff.

Document revision & review history

Version	Author	Revision	Date
2020.1	Ruth Chambers	Policy created	Dec 2020
2021.1	Ruth Chambers	N/A	Nov 2021
2022.1	Ruth Chambers	N/A	Nov 2022
2024.1	Ruth Chambers	Expanded guidance on managing requests for personal data. Added staff agreement on correct use of CCTV as Appendix A	Jan 24
2025.1	Ruth Chambers	Added reference to use of body cams in external sites Added guidelines to retain footage for no more than 30 days.	Sep 2025

APPENDIX A

Correct Use of CCTV

I understand that as I will have access to CCTV as part of my work, I agree to the following:

- To read and follow EF's CCTV Policy.
- To refer all requests for access to information or images to a senior manager promptly.
- Not to allow access to unauthorized individuals to view footage or monitors.
- Not to take or share images for any use unless instructed to do so by senior manager.
- I understand that incorrect or inappropriate use of CCTV images or footage could lead to disciplinary action.

Signed _____

Name _____

Position _____

Date _____