



# 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 appropriate 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 \_\_\_\_\_