



William Henry Smith Foundation

CCTV Policy

Policy Details

Status:	In-house
Frequency of review:	3 yearly
Lead member of staff:	Sarah Kaler
Responsibility of:	Paul Ackroyd
Last reviewed:	Autumn 2023
Next Review Date:	Spring 2026
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1.0 Introduction

The School operates a CCTV system that serves to enhance, supported via other security measures, the safety of students, staff, pets and livestock. In every sense the system serves to safeguard and promote the welfare of the school community; ensuring there is no infringement of privacy or dignity.

Any use of CCTV is to enhance the positive environment for our students to live and learn in. The School have referred to Government guidance [‘Positive environments where children can flourish’](#) and [‘Surveillance and monitoring in residential childcare settings’](#) when assessing the suitability of arrangements for any use of CCTV monitoring. This includes considering the least intrusive ways to support, empower and keep students and our community safe. We therefore always consider whether the use of CCTV is necessary in a situation before use.

We always consider how students’ rights are respected and consider whether the use of CCTV complies with the legislative framework, national minimum standards (NMS), Human Rights legislation and relevant guidance.

2.0 The owner/operator

The William Henry Smith School has installed, and is likely to further develop, a CCTV system (the CCTV system) in and around the premises. Images are recorded centrally on digital media and will be used in strict accordance with this policy. The CCTV system is owned by William Henry Smith School, Boothroyd, Brighouse, West Yorkshire, HD6 3JW.

The SLT are responsible for the operation of the CCTV system and for ensuring that this policy is complied with.

CCTV recordings of individuals that can be identified are covered by the Data Protection Act and General Data Protection Regulations.

The school's Data Protection Officer is the Judicium.

3.0 The CCTV system

The CCTV system consists of fixed and PTZ cameras, monitors, digital video recorders and CCTV warning signs.

Cameras are located at strategic points around the site, principally at the entrance and exit point of the school site and buildings. In addition, internal cameras are located in the residential houses. No camera can see into any bedroom, cameras are pixelated in all such areas.

Recording is conditional on activity within the capture area of each camera.

CCTV warning signs are displayed at strategic points around locations of the school site to make staff, students, visitors and members of the public aware that a CCTV system is in use.

An effort has been made to ensure that the available resources have been used to obtain maximum coverage of the CCTV system. However, it is not possible to guarantee that the CCTV system will detect every incident taking place within the area of coverage.

4.0 The purpose of the CCTV system

The system has been installed by the school with the purpose of helping to ensure the safety, security and wellbeing of staff, students, pets and livestock, reducing incidents and protecting the school premises. There is absolutely no intention of invading any individual's privacy and dignity. These purposes will be achieved by the CCTV system:

- Ensuring student safety via waking night staff
- Helping assist decisions on safeguarding and child protection interventions
- Deterring those persons with criminal intentions (trespassers, vandals, etc)
- Assisting in the prevention and detection of crime
- Identifying activities/events which might lead to disciplinary proceedings being taken against staff or students and to provide evidence to managers and/or to a member of staff or student against whom disciplinary or other action is, or may be taken
- Providing the SLT with information regarding employee compliance with contracts of employment

The CCTV system will not be used to record sound or to provide any images for use on the internet.

5.0 Awareness of the CCTV system

All staff, students, parents/carers and other professionals, such as Social Workers and Local Authorities, are made aware of the system before employment or before young people are admitted to the school, and agree to its use as

part of the pre-admission papers. Regular communication is maintained with both students and parents/carers to ensure that they understand its purpose and that a forum for raising any concerns is encouraged.

All young people experience a 'live' session on the use of CCTV and see it in action, as part of induction. All parents/carers are invited on all Open Days to do the same. Dialog and questionnaires also provide a good source of communication and a chance for student and parent/carer feedback. Where there are any concerns, these are immediately reported to the Principal who promptly authorises an investigation.

6.0 Recording and monitoring stations

Images captured by the CCTV are recorded onto a digital system installed in a secure area. The CCTV system and playback is controlled and monitored from a work station within the school office block. Monitors are not visible from outside the office.

A member of the SLT will monitor and record visits to the waking night person and the effectiveness of the CCTV equipment. Head of Compliance and Health & Safety has a daily visit to speak to the Waking Night Staff.

Senior on Site hands over to the waking night staff member on an evening and a handover takes place the following morning.

7.0 Authorised staff

All authorised staff are made aware of the sensitivity of handling CCTV images and recordings. They are also made aware of any administration duties required when viewing and copying recordings.

The CCTV cameras are in a locked office (only allowing authorised personnel access) the monitors are left on every morning by the waking night staff. This is for a quick response to view the cameras for safeguarding matters.

CCTV room should always remain locked when not in use.

8.0 Recordings

Recordings are stored on a digital device and are over written when the device becomes full. The period of storage of an image depends of the amount of activity being recorded and is about 28 days. It is not possible to retrieve recordings once they have been overwritten.

Any stored recording can be downloaded to a 'Compact Disc or USB drive'. It can also be stored if necessary, in a student's safeguarding folder. However, such a download must be authorised by the Principal or in her absence, another member of SLT and logged in the CCTV logbook together with reasons for the recording (SLT should initial their authorisation).

9.0 Access to live images and recordings

All access is authorised by the Principal, or in her absence by another member of SLT and is recorded in the CCTV logbook (SLT should initial their authorisation).

Access will be restricted to those persons who need to have access in accordance with the purposes of the system.

Staff, students and visitors may be granted access on a case-by-case basis, however only when authorised by the Principal or in her absence, another member of SLT.

Access to recordings by third parties:

Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following authorities (see above for authorisation):

- Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder.
- Prosecution agencies.
- Relevant legal representatives.
- The media where the assistance of the general public is required in the identification of a victim of crime or the identification of the perpetrator of a crime.
- People whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings.
- Emergency services in connection with the investigation of an accident.

All requests will be recorded as a 'Subject Access Request' in our GDPR / Data Protection records. Annual GDPR training is undertaken by all staff.

Access to recordings by a subject:

CCTV recordings that show an identifiable person are covered by the Data Protection Act and General Data Protection Regulations. An individual who believes that they have been filmed by the CCTV system may ask for a copy of the recording, subject to the prohibitions on access also covered by the Data Protection Act. They do not have the right of instant access, they must abide by the Data Protection procedures. Safeguarding will be paramount in any decisions regarding release of CCTV images to an individual and will never be given if other persons are on the image. An individual requesting a copy of a recording on which he is captured must apply in writing to the Principal.

The Principal will arrange for a copy of the film to be made (where appropriate) and given to the applicant. A response will be provided promptly and in the event within forty days of receiving the required fee and information. Any request and outcome will be recorded.

The Data Protection Act and General Data Protection Regulations gives the Deputy Principal the right to refuse a request for a copy of the film particularly where such access could prejudice the safety and wellbeing of any child in care of the school, prevention of or the detection of crime or the apprehension or prosecution of offenders.

During our School Holidays and weekends, members of SLT and Central Services have access to the CCTV via their mobile phones. This is for security purposes and allows us to liaise with our external security company (Gough & Kelly) in the event of any trespassers/intruders.

10.0 Use of Drones on Site

The Smith Foundation recognises that drones (unmanned aerial vehicles) are capable of recording still images and video footage. As such, their use is subject to the same principles of privacy, safeguarding, and data protection as the Foundation's CCTV systems.

- **Authorisation**

- The use of drones on or above Foundation premises must be authorised in advance by the CEO or delegated senior leader.
- Any external contractor using drones for site surveys, maintenance, or promotional purposes must provide evidence of Civil Aviation Authority (CAA) approval, insurance, and risk assessments before flying.

- **Purpose of Use**

- Drones may only be used for legitimate Foundation business, including but not limited to:
 - Building inspections and site maintenance
 - Health and safety checks
 - Marketing and communications (e.g., aerial photography of facilities)
- Drones must not be used for surveillance of staff, students or visitors except in exceptional circumstances, and only with explicit authorisation from the CEO and Safeguarding lead.

- **Safeguarding and Privacy**

- Drone flights must avoid unnecessary capture of identifiable images of students, staff, or visitors. Where such footage is unavoidable, the data will be treated in line with the school's Data Protection Policy and CCTV procedures.
- Parents/carers must be informed in advance if drone footage will be taken for promotional purposes where students may be visible.

- **Data Management**

- Any recorded images or footage will be stored securely, retained only for as long as necessary, and disposed of in accordance with the Foundation's CCTV retention schedule.
- Access to footage is restricted to authorised staff and contractors only.

- **Safety and Compliance**

- All drone operations must comply with UK law and CAA regulations, including airspace restrictions.
- Drone use must not disrupt the normal running and operation of services or compromise the safety of students, staff, or visitors.

Emergency Use of Drones on Site

In exceptional safeguarding situations, such as when a student is reported missing on or near the school or college site, a drone may be deployed to assist in the immediate search.

- **Authorisation**

- Deployment must be authorised by the CEO (or in their absence, the most senior member of staff on site).
- Where possible, the Designated Safeguarding Lead (DSL) should also be consulted before authorisation.

- **Purpose of Use**
 - Drones will only be used in this context for the sole purpose of assisting in locating a missing pupil.
 - Footage captured will not be used for any other purpose unless required by the police for safeguarding or investigatory reasons.
- **Safeguarding and Privacy**
 - Every effort will be made to limit recording to the search area.
 - Any footage inadvertently capturing individuals not involved in the incident will be treated with the same level of confidentiality and protection as CCTV recordings.
- **Data Management**
 - Recorded footage will be handled in line with the Foundations Data Protection, Missing Policy and CCTV policies.
 - It will be retained only as long as necessary for safeguarding or investigatory purposes and then securely deleted.
- **Safety and Compliance**
 - Drones will only be operated by a trained and authorised person, in accordance with Civil Aviation Authority (CAA) requirements.
 - Drone use must not create additional risks to students, staff, or visitors during an emergency situation.

11.0 Complaints

Any complaint or concerns about the operation of the system should be addressed to the Principal. Concerns or enquiries regarding the Data Protection Act 1998 should also be addressed to the Principal.

12.0 Compliance monitoring

Any person wishing to enquire about the CCTV system should contact the Principal.

We are registered with the Information Commissioners Office (ICO)

Upon request enquirers will be provided with:

- A copy of this CCTV policy
- Details on the procedure for requesting a copy of recordings
- Details of the school's complaints procedure

The effectiveness of the CCTV system in meeting its purposes will be kept under review and reports submitted, as required, to the Governing Body.

This policy has been approved by the Governors of The William Henry Smith School and will be reviewed regularly.