



CCTV Policy

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Policy Updated by Alex Hillman March 2026

Ratified by Management Committee

Lead Member; Tina Hamer

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1. Background

1.1 The Maidstone and Malling Alternative, hereafter referred to as ‘the school’, uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and monitor the school building in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.

1.2 CCTV surveillance at the school is intended for the purposes of:

- Protecting the school building and school assets, both during and after school hours.
- Promoting the health and safety of staff, pupils and visitors.
- Preventing bullying.
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
- Supporting the Police in a bid to deter and detect crime.
- Assisting in identifying, apprehending and prosecuting offenders; and ensuring that the school rules are respected so that the school can be properly managed.

1.3 The system consists of 61 fixed cameras that have the capability to record both video and audio.

1.4 CCTV cameras are not located in sensitive areas.

1.5 The CCTV system is owned and operated by the school and the deployment of which is determined by the school’s leadership team.

1.6 The CCTV is monitored via a central restricted area and remote access.

1.7 The restricted area is secured both during and after school hours with access strictly limited to the Network manager, Premises manager and Headteacher. Authorised personnel have access to the remote viewer.

1.8 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 staff performance.

2. Justification of Use of CCTV

2.1 The use of CCTV to control the perimeter of the school building for security purposes has been deemed to be justified by the leadership team. The system is intended to capture images of

intruders or of individuals damaging property or removing goods without authorisation or of anti-social behaviour.

2.2 CCTV systems will not be used to monitor staff performance.

3. Data Protection Impact Assessment

3.1 Where new CCTV systems or cameras are to be installed, the school will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This may involve the need for consultation with staff, parents and local residents.

3.2 The existing installation was installed in 2018 and whenever any additional cameras are required, an impact assessment is carried out. See Appendix 2. Once this has occurred we determine if there are any alterations required to the system. In addition regular monitoring of the camera function is conducted with any repairs carried out in a timely manner.

4. Locations of Cameras

4.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated.

4.2 The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. The school will make every effort to position cameras so that their coverage is restricted to the school premises; which may include outdoor areas.

4.3 Internal CCTV cameras are currently located in all classrooms, corridors, the foyer, reception areas and offices. This applies to the main building, the mobile classroom and the construction building.

4.4 External CCTV cameras are positioned as to capture the outside play areas, front car park, rear car park, the front gate of the main building. For the mobile classroom; the entrance, front of the building, rear of the building and the sides. For the construction building; the entrance, front of the building, rear of the building and the sides.

4.5 All cameras are positioned in such ways to prevent or minimise recordings of passers-by or of another person's private property.

4.6 CCTV video monitoring and recording of public areas may include the following:

- Protection of school building and property.
 - The building's perimeter, entrances and exits, foyers and corridors, classrooms, office locations and areas of receiving goods and services.
- Monitoring of access control systems.

- Monitor and record restricted access areas at entrances to the building and other areas.
- Verification of security alarms.
 - Intrusion alarms, exits door controls and external alarms.
- Police criminal investigation.
 - Robbery, burglary and theft surveillance.

5. Notification

5.1 A copy of this CCTV policy will be provided on request to staff, pupils, parents and visitors to the school and will be made available on the school website.

5.2 Signage to indicate that CCTV is in operation will be located throughout the school.

5.3 Signage will be predominately displayed at the entrance of the school. The signage will indicate CCTV operation is in operation every day of the year.

5.4 Other locations of CCTV signage are located in the corridors.

5.5 Visitors, when signing in on the school's visitor access system, will be notified of CCTV operations within the school.

6. Storage and Retention

6.1 The images captured by the CCTV system will be retained for a maximum of 25 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

6.2 The images/recordings will be stored in a secure location with limited access.

6.3 Access will be strictly limited to authorised personnel. Supervising access and maintenance of the CCTV system is the responsibility of the Network manager.

6.4 In certain circumstances, the recordings captured may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are viewed, access will be limited to authorised individuals on a need-to-know basis.

6.5 Extracted recordings will be stored in a secure area of the network with limited access to only authorised personnel.

7. Access

7.1 The monitoring equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel.

7.2 Remote access to the CCTV system has been enabled. Only authorised members of staff can access the remote viewer. Additionally, authorised staff must only use devices connected to the school's network to access the remote viewer.

7.3 Access to the CCTV system and stored images will be restricted to authorised personnel only.

7.4 As of ratification of this policy a log of access, appendix 1, will be kept electronically in the restricted area and will be completed when accessing images. This log of access deleted at the end of each academic school year.

7.5 A record of the date and any disclosure request along with details of who the information has been provided to (name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

7.6 Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

7.7 In relevant circumstances, CCTV footage may be accessed:

- By the police where the school, or its agents, are required by law to make a report regarding the commission of a suspected crime.
- Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on the school's property.
- To the HSE and/or any other statutory body charged with child safeguarding.
- To assist the Headteacher/SLT and or the safeguarding team in establishing facts in cases of unacceptable pupil behaviour, which in case, the parents/guardians will be informed.
- To data subjects or those who represent the data subject pursuit of a Subject Access Request.
- To individuals, or their representatives, subjected to a court order.
- To the school insurance company where the insurance company requires footage in order to pursue a claim for damage done to insured property.

8. Subject Access Requests

8.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

8.2 Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

8.3 The school will respond to requests within 30 school days of receiving the request in line with the school's right of access policy.

8.4 The school reserves the right to deny access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

8.5 A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

8.6 In giving a person a copy of their data, the school will provide recordings via USB. The school has the right to deny access to this data should it contain information on other individuals.

9. Complaints

9.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.

10. Staff Training

10.1 Staff authorised to access the CCTV system will be trained to comply with this policy. Staff will understand that all information relating to the CCTV images must be handled securely.

10.2 Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.

10.3 Staff misuse of surveillance system information could lead to disciplinary proceedings.

Appendix 1

CCTV Access Log

All authorised staff looking at CCTV must complete this form.

(The first entry is an example of how the log must be completed.)

SURNAME	FORENAME	DATE	TIME	REASON	RETAINED	REASON
SURNAME	Forename	01/02/2021	14:00 pm	Pupil A was reported to be smoking inside the school building. CCTV footage confirmed report.	Yes	Evidence to be used in meeting with parents.

Appendix 2

CCTV Data Impact Assessment

1. Identify the need for a CCTV DPIA

What is the aim of the project?

CCTV delivers benefits in terms of improved health and safety and security.

Maidstone and Malling Alternative Provision's (MMAP) use of CCTV aims to achieve the following:

- Improve the health and safety and security of students, staff, and visitors.
- Protect the Academy premises.
- Reduce vandalism.
- Aid in the detection and prevention of crime.

Students, parents and staff have the assurance that these measures increase safety and security of the school's premises.

Why is CCTV data captured?

CCTV cameras are in place purely for security, both for our premises and equipment and for the safety & security of our staff, students and visitors. Data is stored for 25 days and used only in the case of an incident.

Camera locations

Location	Internal/external	Viewpoint	Sound	Pan/zoom	Operation hours
Classroom 5	Internal	Classroom 5 including room door	Yes	No	24 hours
Office room 6	Internal	Room 6 office including office door	Yes	No	24 hours
Meeting room	Internal	Meeting room including room door	Yes	No	24 hours
Classroom 7	Internal	Classroom 7 including room door	Yes	No	24 hours
Exams office	Internal	Exams office including office door	Yes	No	24 hours
Headteacher's office	Internal	Headteacher's office including office door	No	No	24 hours
Office room 8	Internal	Room 8 office including office door	Yes	No	24 hours
Classroom 9	Internal	Classroom 9 including room door	Yes	No	24 hours
Main Corridor (view 1)	Internal	The main corridor facing west including stair case	Yes	No	24 hours

		door, toilet doors and meeting room door			
Main Corridor (view 2)	Internal	The west end of the main corridor including room 6 and classroom 5 doors	Yes	No	24 hours
Main Corridor (view 3)	Internal	The main corridor facing east including stair case door and through door	Yes	No	24 hours
Alcove	Internal	The doors to Headteacher's office, Exams office and Classroom 7	Yes	No	24 hours
Main stair case	Internal	The main stairs, entrance to the main corridor and a toilet door on landing	Yes	No	24 hours
Corridor bridge	Internal	Main corridor facing west on the east side of the building	Yes	No	24 hours
Corridor to classroom 10 (view 1)	Internal	Corridor going to room 10, IT office door, server room door and classroom 10 door	Yes	No	24 hours
Corridor to classroom 10 (view 1)	Internal	Corridor going to room 10, safeguarding office door and server room door	Yes	No	24 hours
Back stair case	Internal	Back stair case and fire exit	Yes	No	24 hours
IT office	Internal	IT office including office door	Yes	No	24 hours
Classroom 10	Internal	Classroom 10 including room door	Yes	No	24 hours
Front garden	External	The front garden pond area	No	No	24 hours
Front car park	External	The front car park	No	No	24 hours
Front gate	External	The front gate	No	Yes - Zoom	24 hours
Fire exit door 1	External	Fire exit door and windows of classroom 2	No	No	24 hours
Side gate	External	The side gate and paved path to the back of the building	No	No	24 hours
Rear car park (view 1)	External	Rear car park and part of the playground	No	No	24 hours
Rear car park (view 2)	External	Rear car park and fire exit 2	No	No	24 hours
Door to the playground	External	Back door to the building and part of the playground	No	No	24 hours
Playground	External	The playground, pond areas, art and construction lessons buildings	Yes	No	24 hours

Pond area	External	Pond area at the back of the playground	No	No	24 hours
Quiet room	Internal	Quiet room including room door	No	No	24 hours
Photocopying room	Internal	Photocopying room including room door	Yes	No	24 hours
Classroom 4	Internal	Classroom 5 including room door	Yes	No	24 hours
Alcove outside classroom 4	Internal	Doors to photocopying room, classroom 4, staff kitchen and electrical door	Yes	No	24 hours
Ground floor corridor (view 1)	Internal	Lower corridor facing west and fire exit 1 door	Yes	No	24 hours
Classroom 2	Internal	Classroom 2 including room door	Yes	No	24 hours
Foyer (view 1)	Internal	Full floor area including reception door and main entrance	Yes	No	24 hours
Foyer (view 2)	Internal	Full floor area including door to classroom 2	Yes	No	24 hours
Front door	Internal	The main entrance to the school	Yes	No	24 hours
Reception office (view 1)	Internal	The reception office looking east	Yes	No	24 hours
Reception office (view 2)	Internal	The reception office looking west	Yes	No	24 hours
Ground floor corridor (view 2)	Internal	Lower corridor and door to toilet	Yes	No	24 hours
Ground floor corridor (view 3)	Internal	Lower corridor and classroom 1 door	Yes	No	24 hours
Classroom 1	Internal	Classroom 1 including room door	Yes	No	24 hours
Pastoral corridor	Internal	Pastoral corridor including doors to room 8 and classroom 9	Yes	No	24 hours
Back porch (view 1)	Internal	Back porch area including doors to staff area, classroom 3 and cellar	Yes	No	24 hours
Back porch (view 2)	Internal	Back porch area including back door to playground	Yes	No	24 hours
Fire exit 3 stairs	External	The metal stairs coming down from fire exit 3	No	No	24 hours
Art building foyer	Internal	Art building foyer including entrance, toilet, kitchen and classroom doors	Yes	No	24 hours
Classroom 11	Internal	Classroom 11 including room door and fire exit 4	Yes	No	24 hours
Front of art building	External	Art building entrance and part of the playground	No	No	24 hours
West side of art building	External	West side of the art building	No	No	24 hours

East side of art building	External	East side of the art building	No	No	24 hours
Rear of art building	External	Rear of the art building including boundary wall	No	No	24 hours
Front of construction building	External	Front of the construction building and archway	No	No	24 hours
Construction building entrance	Internal	Entrance to the construction building	Yes	No	24 hours
Classroom 12	Internal	Classroom 12 including room door and fire exit 5	Yes	No	24 hours
Back gate of the construction building	External	Back gate of the construction building	No	No	24 hours
Staff room	Internal	Staff room including room door	No	No	24 hours
Classroom 3	Internal	Classroom 12 including room door	Yes	No	24 hours

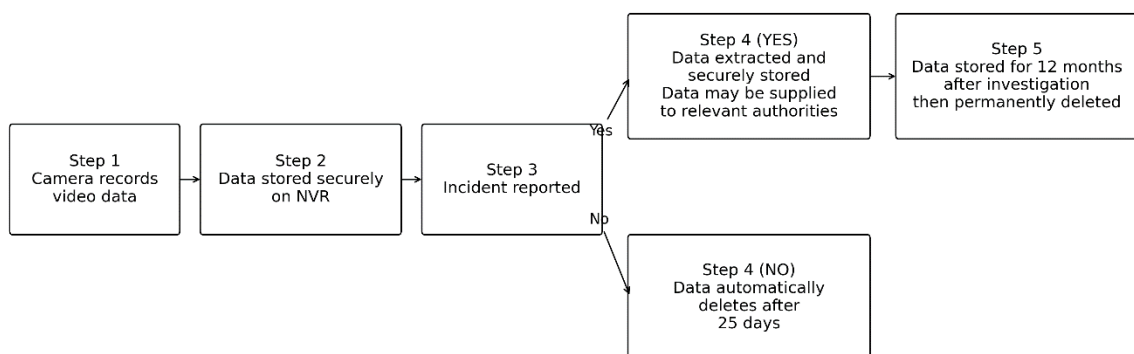
2. Describe the processing

What is the source of the data?

The CCTV system will provide MMAP with video pictures, including audio, from the locations listed above.

The images and audio are stored to the secure NVR in the school's server room with restricted access.

Data flow



How will you use the CCTV data?

CCTV data is used to ensure the health & safety and security of students, staff and visitors. The presence of CCTV cameras acts as a crime prevention method.

CCTV cameras can be used to detect unauthorised visitors and protection of damage to MMAP assets. In the event of an incident, e.g. crime, data may be shared with the Senior Management Team and/or local authority and/or police for investigation and enforcement purposes.

How will you store the CCTV data?

CCTV camera recordings are stored securely on the camera's Hikvision NVR system which is located in a restricted location within the school.

Data is extracted from the NVR by authorised members of staff. Extracted data is stored in an area of the school's network which has limited access.

How will you delete the CCTV data?

CCTV recordings are deleted from the camera NVR's secure storage automatically after 25 days.

What is the nature of the data?

The CCTV data captured is video recordings.

Special Category data

By default, the CCTV may be picking up special category data including race/ethnic origin and the health of an individual.

By limiting storage and access of the data to the conditions described above, any risks associated with capturing data is minimised.

How much data is collected and used and how often?

The CCTV is operational 24 hours a day, 7 days a week. Recording is initiated upon detection of movement in the area being monitored.

How long will you keep the data for?

Recorded data will be retained for 30 days unless requested as part of an incident investigation and then stored on archive for 12 months from the conclusion of any such investigation. NVR system automatically deletes the all recordings after 25 days.

Scope of data obtained?

The CCTV data is obtained within the school's premises both internal and outdoor areas.

What is the nature of your relationship with the data subjects?

MMAP provides education to its students on a term time basis. The school may receive a number of visitors on a daily basis including contractors, inspectors, examiners, support and agency staff, etc.

How much control will they have?

MMAP informs students, parents, staff, visitors and any potential data subjects that CCTV is in use by use of signage throughout the school.

The CCTV system does not use any form of facial recognition or identifying.

A data subject may make a written request for a copy of the recorded data in which they appear.

Are there prior concerns over this type of processing or security flaws?

Use of the CCTV system is proportionate and justified. It is also achieved for the MMAP the following benefits:

- Demonstrates a duty of care to its students, staff, and visitors;
- Protects the fabric of MMAP both externally and internally;
- As a consequence of this, budgets can be reduced/deferred to other MMAP projects;
- Encourages improvements in student behaviour;
- Aids in the detection and prevention of crime;
- Assists in managing the school.

3. Consultation process

The views of students, parents and staff will be obtained. Once reviewed, the views of these parties will be taken into account when considering whether any adjustments to the school's current CCTV use are justified.

4. Assess necessity and proportionality

What is the lawful basis for processing?

The lawful basis for processing includes the following:

- Article 6 and Article 9 (Special Category Data) under Data Protection Law;
- The Common Law Duty of Care;
- Health and Safety at Work Act;
- Safeguarding Vulnerable Groups Act;
- Working together to Safeguard Children Guidelines (DfE).

Does the processing achieve your purpose?

Cameras are located in areas where students, staff and visitors have access. Cameras are not located in areas where privacy is expected.

Is there another way to achieve the same outcome?

Staff are present during all school operational hours; however, this cannot provide an equally constant protection or deterrent which is given by the presence of CCTV monitoring.

How will you ensure data quality and data minimisation?

By limiting storage of data to the NVR systems, and by not extracting any data except in the conditions set out in section 'How will we use the CCTV data?' , the school minimises any risk of a data breach.

What information will you give the individuals?

MMAP informs students, staff and visitors, by way of signage and via the visitor signing in system, that CCTV is in use.