



Tarbiyyah Secondary School (TSS) CCTV Policy

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Prepared by: Headteacher/ Deputy Headteacher

Agreed with: Chair of Trustees

To be reviewed and updated: August 2027

1. Introduction Tarbiyyah Secondary School (TSS) operates a Closed-Circuit Television (CCTV) system on its premises, including within classrooms, for the purposes outlined in this policy. This policy outlines TSS's commitment to operating its CCTV system responsibly, ethically, and in full compliance with relevant legislation, particularly in relation to data protection and individual privacy.

2. Purpose of the CCTV System The primary purposes for which TSS utilises CCTV are:

- **Safety and Security:** To ensure the safety and security of pupils, staff, visitors, and school property.
- **Crime Prevention and Detection:** To deter criminal activity, and to assist in the investigation and detection of crime or anti-social behaviour occurring on school premises.
- **Safeguarding:** To support the school's robust safeguarding framework by providing evidence in cases of serious behavioural incidents, bullying, or allegations of misconduct, thereby contributing to a safe learning and working environment.
- **Incident Management:** To assist in the effective management of incidents, accidents, or emergencies.

3. Scope This policy applies to all CCTV cameras, recording equipment, and associated data processing activities within and around Tarbiyyah Secondary School premises, including all classrooms. It covers all individuals entering the school premises, including pupils, staff, visitors, contractors, and members of the public.

4. Legal Framework TSS operates its CCTV system in strict adherence to the following key legislation:

- **The UK General Data Protection Regulation (UK GDPR):** Governs the processing of personal data. CCTV footage that identifies individuals is considered personal data.
- **The Data Protection Act 2018 (DPA 2018):** Supplements the UK GDPR and provides specific provisions for data protection in the UK.
- **Human Rights Act 1998:** Particularly Article 8, the right to respect for private and family life, home and correspondence. The operation of CCTV must be proportionate and necessary.
- **Regulation of Investigatory Powers Act 2000 (RIPA):** Relevant for covert surveillance, though TSS's CCTV is overtly operated.
- **Information Commissioner's Office (ICO) CCTV Code of Practice:** Provides best practice guidance for organisations operating CCTV.

5. Lawful Basis for Processing TSS processes personal data via CCTV under the lawful basis of "**Legitimate Interests**" (Article 6(1)(f) UK GDPR). The legitimate interests pursued are the safety and security of pupils, staff, and visitors, the protection of school property, and

the prevention and detection of crime and anti-social behaviour. This legitimate interest is balanced against the fundamental rights and freedoms of individuals, and the school has conducted a **Data Protection Impact Assessment (DPIA)** to ensure proportionality and necessity.

6. Camera Locations CCTV cameras are strategically placed throughout the school premises. This includes:

- **Perimeter and Entrances:** To monitor access to the school grounds.
- **Corridors and Communal Areas:** To monitor general movement and deter anti-social behaviour.
- **Classrooms:** A camera is installed in **each classroom**. The intent for classroom cameras is specifically for the **safety and safeguarding of pupils and staff**, to deter disruptive behaviour, and to provide evidence in cases of serious incidents that may occur during lessons.
- **Outdoor Areas:** Playground/car park.

N.B. Cameras are explicitly NOT located in private areas such as toilets, staff rooms, or private offices.

7. Signage Clear, prominent, and legible signs are displayed at the entrances to the school premises and in areas where CCTV is in operation. These signs inform individuals that they are entering an area under surveillance, state the purpose of the CCTV system, and provide contact details for TSS's Data Protection Officer (DPO) or the school office for further information, including access to this full policy.

8. Data Retention CCTV footage is retained for a period of **30 days**, from the date of recording. After this period, the footage is automatically and securely overwritten or deleted.

- Footage may be retained for longer than the standard retention period only if it is required as evidence for an investigation (e.g., criminal incident, safeguarding concern, disciplinary matter), in which case it will be securely stored until the conclusion of the relevant process. The reason for extended retention will be documented.

9. Access to and Disclosure of CCTV Footage

9.1 Internal Access:

- Access to live and recorded CCTV footage is strictly restricted to authorised personnel only (e.g., Headteacher, Deputy Headteacher, designated Senior Leadership Team members, Site Manager, Data Protection Officer) whose duties necessitate such access for the purposes outlined in Section 2.
- All authorised personnel undergo appropriate training on data protection and confidentiality.
- Access logs are maintained to record when footage is accessed and by whom.

9.2 External Disclosure: CCTV footage will only be disclosed to third parties in limited and legally justifiable circumstances, including:

- **Law Enforcement:** To the police or other law enforcement agencies for the prevention or detection of crime, or for national security purposes, upon a legitimate and formal request.
- **Emergency Services:** To emergency services (e.g., ambulance, fire brigade) in connection with an emergency.
- **Legal Proceedings:** Where required for legal proceedings or by a court order.
- **Child Protection:** To children's social care or other safeguarding agencies in cases of serious safeguarding concerns, in accordance with the school's Child Protection and Safeguarding Policy.
- **Insurance Companies:** In connection with an insurance claim where footage provides relevant evidence, and appropriate data sharing agreements are in place.

All disclosures are recorded, and strict protocols are followed to ensure only necessary information is shared.

10. Individual Rights Individuals have rights under the UK GDPR in relation to their personal data, including CCTV footage:

- **Right to be Informed:** This policy and signage fulfil this right.
- **Right of Access (Subject Access Request - SAR):** Individuals (or their legal representatives) have the right to request a copy of their personal data, including footage of themselves. Requests should be made in writing to the DPO. TSS will endeavour to respond within one month. The school reserves the right to obscure third parties in the footage to protect their privacy.
- **Right to Rectification, Erasure, Restriction:** These rights apply, though their applicability to live and routinely overwritten CCTV footage may be limited. Any requests will be assessed on a case-by-case basis.
- **Right to Object:** Individuals can object to the processing of their data based on legitimate interests, which will be considered.

11. Data Protection Impact Assessment (DPIA) TSS has conducted a DPIA to assess and mitigate the risks to individuals' privacy associated with the use of CCTV, particularly given the inclusion of cameras in classrooms. This DPIA is regularly reviewed and updated to reflect any changes to the system or its operation.

12. Data Security All CCTV equipment and data are secured against unauthorised access, accidental loss, destruction, or damage. Footage is stored on secure servers with appropriate technical and organisational measures in place, including access controls and encryption where feasible.

13. Review of the Policy This CCTV Policy will be reviewed annually by the school leadership team and the Data Protection Officer (DPO) or sooner if there are significant changes in legislation, technology, or school operations.

14. Roles and Responsibilities

- **Governing Body:** Has overall responsibility for ensuring the school complies with its data protection obligations.
- **Headteacher/Senior Leadership Team:** Responsible for the day-to-day operation of the CCTV system and ensuring staff adherence to this policy.
- **Data Protection Officer (DPO):** Responsible for advising on data protection compliance, monitoring adherence to this policy, and acting as the point of contact for individuals regarding their data rights.

15. Concerns and Complaints Any concerns or complaints regarding the operation of the CCTV system should be directed to the school office or the Data Protection Officer in the first instance. If an individual remains dissatisfied, they have the right to lodge a complaint with the school.