

Statement of Intent

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Weald of Kent Grammar School (the **School**). It also serves as a notice and a guide to data subjects (including pupils, 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. This policy will be subject to review from time to time, and should be read with reference to the School's Data Protection Policy accessible [here](#)

All fixed cameras are in plain sight on the 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.

1. Objectives of the System

- 1.1 To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 1.2 To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- 1.3 To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- 1.4 To monitor the security and integrity of the School site and deliveries and Arrivals
- 1.5 To monitor staff and contractors when carrying out work duties.
- 1.6 To monitor and uphold discipline among pupils in line with the School Rules, which are available to parents and pupils on request.

2. Positioning

- 2.1 Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.
- 2.2 Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.
- 2.3 No images will be captured from areas in which individuals would have a

heightened expectation of privacy, in particular changing and washroom facilities.

2.4 However, individuals should expect that images may be captured within public communal areas and site entrances.

2.5 CCTV is located at various areas around the site considered higher risk or where increased security is deemed necessary.

2.6 Current Locations:

TONBRIDGE CAMPUS
Student Entrance Gate
Main Reception Internal
G4 Internal road
G4 Sports Field
G2 Walkway
Uniform Shop driveway
Workshop Walkway
Main Gates
Sports Hall Car Park
D1 Square
Sports Hall Front Entrance
Sports Hall Rear Entrance
Sports Hall Reception internal
Main Hall Square
D1 Entrance
D4 Entrance
D5 Entrance
T5 Modular
Sixth Form Café
Café External
T1 Rear Gate
A6 Walkway
Rear of Technology
Rear of Science
Rear of Student Services
Rear of Maths
Sports Hall side Path
Front Entrance Car Park

Main Car Park
Front Entrance

Additional locations at the Tonbridge campus (installed September 2026)

- Outside DT Toilets
- Outside F Floor Toilets
- Outside B Floor Boys' Toilets
- Outside B Floor Girls' Toilets
- Outside Sports hall 1st floor toilets
- Outside A Floor Girls' Toilets (by A1)
- Outside A Floor Girls' Toilets (by SLT Office)
- Outside D Floor Toilets
- Outside G Floor Toilets
- Outside DR1 Toilets

SEVENOAKS CAMPUS
Bottom end of carpark & top end of All-Weather pitch
Bottom end of carpark, facing towards main entrance
Sports Hall Corridor to Carpark Entrance
All Weather pitch
Muga Courts
Back of Patio area
Patio area
Entrance to Patio
Looking down towards TWBG school Entrance
Reception Entrance
DT Entrance (SA3 / SA4)
Pathway outside Technology

3. Maintenance

3.1 The CCTV System will be operational 24 hours a day, every day of the year.

3.2 The System Manager (defined below) will check and confirm that the System is properly recording and that cameras are functioning correctly, on a monthly basis.

3.3 The System will be checked and (to the extent necessary) serviced no less

than annually.

4. Supervision of the System

4.1 Staff authorised by the School to conduct routine supervision of the System will include the IT team, Site Manager, SLT, and DSLs.

4.2 Footage 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.

4.3 Footage will only be downloaded and distributed at the express permission of the Headteacher.

5. Storage of Data

5.1 The day-to-day management of images will be the responsibility of IT Manager who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.

5.2 Images will be stored locally for up to 30 days, and automatically overwritten 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.

5.3 Where such data is retained, it will be retained in accordance with the Data Protection act (2018) and our Data Protection and Privacy Policies. 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.

6. Access to Images

6.1 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).

6.2 Individuals also have the right to request the personal data the School holds on them (please see the Data Protection Policy), including information held on the CCTV System, if it has been kept. The School will require specific details including at least time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable. Individuals will also have the right to have their image erased where this is technically possible.

6.3 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 examples when the System Manager may authorise access to CCTV images;

6.3.1 Where required to do so by the Headteacher, the Police or some relevant statutory authority;

- 6.3.2 To make a report regarding suspected criminal behaviour;
- 6.3.3 To enable the Designated Safeguarding Lead or his/her appointed deputies to examine behaviour which may give rise to any reasonable safeguarding concern;
- 6.3.4 To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian will be informed as part of the School's management of a particular incident;
- 6.3.5 To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 6.2 above;
- 6.3.6 To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
- 6.3.7 In any other circumstances required under law or regulation

6.4 Where images are disclosed under (6.3 above) a record will be made in the system log book 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).

6.5 Where images are provided to third parties under 6.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

7. Other CCTV systems

7.1 The School does not own or manage third party CCTV systems, but may be provided with images of incidents from third parties, where this is in line with the objectives of the School's own CCTV policy and/or its School Rules.

8. Complaints and queries

8.1 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 IT Manager.

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.

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