



Orange Tree School

CCTV Policy

2026 – 2027



DOCUMENT DETAILS	
Applies To:	• All Staff • External suppliers or visitors • Regulatory / Legal bodies/LEAs • Other (e.g. Parents, Patients) • Students • Hospital Staff
Policy Author (Subject Matter Expert):	Zoe Ramshaw/Helen Carmel
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Policy Summary

Purpose

This policy applies to the CCTV system operated by Orange Tree School at the Main Site. CCTV covering Ridgeway Hospital Provision is operated separately by Ellern Mede Hospital under its own governance arrangements.

Orange Tree School uses Closed-Circuit Television (CCTV) to support safeguarding, promote the safety and wellbeing of pupils, staff and visitors, protect school property, deter criminal activity and assist in the investigation of incidents where appropriate.

The school is committed to operating its CCTV system lawfully, fairly and transparently, ensuring that surveillance is proportionate, necessary and respectful of individuals' privacy rights.

Core Principles

Orange Tree School will ensure that:

- CCTV is used only for legitimate educational, safeguarding, health and safety and security purposes.
- The operation of CCTV complies with UK GDPR, the Data Protection Act 2018 and relevant guidance.
- Surveillance is proportionate and does not unnecessarily intrude upon individual privacy.
- Access to CCTV footage is strictly controlled and limited to authorised personnel.
- CCTV recordings are securely stored, retained only for as long as necessary and disposed of safely.
- Requests to view CCTV footage are managed in accordance with the School's Data Protection Policy.

Key Expectations

- CCTV will only be used for legitimate operational purposes.
- Cameras will not be installed in areas where individuals have a reasonable expectation of privacy, such as toilets or changing facilities.
- CCTV footage will only be viewed where there is a legitimate safeguarding, security, disciplinary or legal reason.
- Staff should report CCTV faults to Helen Carmel (Business Manager).
- Requests to access CCTV footage must be referred to Helen Carmel (Business Manager).
- CCTV footage must never be copied, shared or uploaded without appropriate authorisation.
- CCTV images must not be uploaded to unauthorised Artificial Intelligence (AI) platforms or analysed using public AI systems.

- Staff must not photograph, video or otherwise record CCTV footage using personal devices.

Related Policies

- Data Protection Policy
- Cyber Security Policy
- Online Safety Policy
- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Mobile Phone and Personal Devices Policy
- Complaints Policy
- Privacy Notices

Legislation and Guidance

This policy has been developed with regard to:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Human Rights Act 1998
- Protection of Freedoms Act 2012
- Freedom of Information Act 2000
- Education (Independent School Standards) Regulations 2014
- Information Commissioner's Office (ICO) guidance on CCTV
- Surveillance Camera Code of Practice (where applicable)

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1. Introduction

Orange Tree School recognises that CCTV plays an important role in safeguarding pupils, protecting staff and visitors, maintaining a safe learning environment and protecting school property.

Orange Tree School operates CCTV at the Main Site as part of its safeguarding, health and safety and security arrangements.

Ridgeway Hospital Provision is located within the Ellern Mede Hospital site. External CCTV covering the hospital site, including the area surrounding the school building, is operated and monitored by Ellern Mede Hospital under its own CCTV and data protection arrangements. Orange Tree School does not operate or monitor this CCTV system.

This policy therefore applies to the CCTV system operated by Orange Tree School at the Main Site. Where CCTV footage from the hospital site is required to support a safeguarding, health and safety or other investigation relating to Ridgeway Hospital Provision, requests will be made through the appropriate Ellern Mede Hospital procedures.

The school operates CCTV as part of its wider safeguarding, security and risk management arrangements. The use of CCTV supports the investigation of incidents, assists in the prevention and detection of crime, helps protect individuals from harm and contributes to the effective management of the school.

The school is committed to ensuring that CCTV is used responsibly, proportionately and transparently. Surveillance will always be balanced against individuals' rights to privacy and will only be used where there is a legitimate purpose.

This policy applies to all employees, volunteers, contractors, pupils, parents, visitors, members of the Advisory Board and any other individuals whose personal data may be captured by the School's CCTV system.

2. Legal and Regulatory Framework

Orange Tree School operates its CCTV system in accordance with:

- UK General Data Protection Regulation (UK GDPR);
- Data Protection Act 2018;
- Human Rights Act 1998;
- Protection of Freedoms Act 2012;
- Freedom of Information Act 2000;
- Education (Independent School Standards) Regulations 2014;
- relevant Information Commissioner's Office (ICO) guidance; and

- other applicable legislation and statutory guidance.

The school recognises that CCTV images constitute personal data where individuals can be identified and will therefore process all recorded images in accordance with data protection legislation.

3. Principles of CCTV Use

Orange Tree School will ensure that CCTV:

- is used only where there is a clear and legitimate purpose;
- supports safeguarding and the welfare of pupils;
- protects staff, visitors and school property;
- assists with the investigation of incidents where appropriate;
- operates fairly, transparently and proportionately;
- does not unnecessarily intrude upon privacy;
- is supported by appropriate signage throughout the School.

The school will not use CCTV:

- to monitor staff performance routinely;
- to monitor teaching and learning activities without lawful justification;
- in toilets, changing facilities or other private areas;
- for any purpose incompatible with this policy.

4. Roles and Responsibilities

Advisory Board

The Advisory Board is responsible for:

- receiving assurance that CCTV is operated lawfully and proportionately;
- monitoring compliance through governance arrangements;
- supporting the school in meeting its statutory responsibilities.

Headteacher

The Headteacher has overall responsibility for ensuring that CCTV is operated appropriately across the school and supports safeguarding, security and the effective management of the school.

Business Manager

The Business Manager has day-to-day operational responsibility for the CCTV system.

Responsibilities include:

- overseeing the operation of the CCTV system;
- authorising access to CCTV footage;
- coordinating responses to requests for footage;
- ensuring retention periods are followed;
- maintaining appropriate records of access;
- liaising with the Data Protection Officer where required;
- ensuring CCTV arrangements remain compliant with data protection legislation.

Site Manager

- The School Site Manager is responsible for the technical maintenance of the CCTV system and for reporting faults or maintenance requirements to the Business Manager.
- The Site Manager is not authorised to routinely access or view CCTV recordings unless specifically authorised by the Headteacher or Business Manager for maintenance purposes.

Data Protection Officer (Aanika Patel)

The Data Protection Officer provides independent advice regarding:

- compliance with UK GDPR;
- Subject Access Requests involving CCTV footage;
- disclosure of CCTV recordings;
- Data Protection Impact Assessments;
- complaints relating to privacy; and
- liaison with the Information Commissioner's Office where appropriate.

The Data Protection Officer can be contacted via:

data.protection@ellernmede.org

5. CCTV Coverage and Camera Locations

Orange Tree School operates CCTV at the Main Site. CCTV covering Ridgeway Hospital Provision is operated separately by Ellern Mede Hospital under its own governance arrangements.

CCTV Coverage

The school currently operates CCTV across the Main Site, including:

- the perimeter of the school buildings and grounds;
- entrances, exits and external access points;
- reception and visitor areas;
- corridors and circulation spaces;

- stairwells;
- communal areas,
- Friary Hall;
- designated therapy rooms;
- other locations identified through the school's safeguarding, security and risk assessment processes.

The school reviews camera locations periodically to ensure surveillance remains proportionate, necessary and effective.

Appropriate CCTV signage will be displayed at entrances to the school and in areas covered by surveillance to ensure that pupils, staff, parents, visitors and contractors are aware that CCTV is in operation.

CCTV cameras will not be installed in toilets, changing facilities or any location where individuals would reasonably expect complete privacy.

The school recognises that many pupils may require additional therapeutic, emotional or behavioural support. CCTV forms one element of the school's wider safeguarding framework and helps ensure that pupils, staff and visitors are protected whilst maintaining an environment that is safe, nurturing and respectful.

Therapy Rooms

CCTV is installed within the school's designated therapy rooms. These rooms are frequently used for one-to-one therapeutic, educational and pastoral support with pupils and the cameras form part of the school's wider safeguarding arrangements. The purpose of the cameras is to safeguard pupils and staff, provide an accurate record of significant incidents where necessary and support the investigation of safeguarding or behavioural concerns. The cameras record video images only and do not record audio.

CCTV footage may be reviewed following safeguarding concerns, behavioural incidents, accidents, allegations, complaints or the use of reasonable force in order to establish an accurate account of events and support the school's safeguarding responsibilities.

6. Operation of the CCTV System

The CCTV system operates continuously, 24 hours a day, 365 days a year.

The system records video images only and does not record audio.

The CCTV system is operated for the purposes set out in this policy and will only be used where there is a legitimate safeguarding, health and safety, security, operational or legal reason to do so.

The school will ensure that:

- CCTV equipment is maintained in good working order;
- camera positions remain appropriate and proportionate;
- recording equipment is secure from unauthorised access;
- appropriate signage is displayed informing individuals that CCTV is in operation;
- recorded footage is protected against unauthorised viewing, copying or disclosure.

CCTV footage may be reviewed where necessary in relation to:

- safeguarding concerns;
- pupil welfare;
- behavioural incidents;
- allegations involving pupils or staff;
- complaints;
- health and safety incidents;
- accidents;
- criminal activity;
- malicious damage or theft;
- the use of reasonable force or restrictive intervention;
- investigations undertaken by the school or external agencies.

CCTV will not be used for the routine monitoring of staff performance or teaching practice.

7. Storage, Retention and Security

All CCTV footage will be stored securely using password-protected systems with appropriate technical safeguards.

Only authorised personnel will have access to recorded footage.

CCTV recordings will normally be retained for 30 days, after which they will be automatically overwritten unless required for:

- an ongoing safeguarding investigation;
- disciplinary or grievance proceedings;
- police investigations;
- legal proceedings;
- insurance claims;
- other lawful purposes.

Where footage is retained beyond the normal retention period, it will only be kept for as long as necessary and will then be securely deleted.

Downloaded recordings will be encrypted where appropriate and handled in accordance with the School's Data Protection Policy and Cyber Security Policy.

The CCTV system will be maintained by the School Site Manager under the direction of the Business Manager. Where specialist maintenance or repair is required, appropriately authorised contractors will be engaged.

Any faults affecting the CCTV system must be reported without delay to Helen Carmel so that appropriate action can be taken.

The CCTV system will be checked regularly to ensure that cameras, recording equipment and storage systems are operating correctly. Any faults will be addressed promptly to minimise disruption to the school's safeguarding and security arrangements.

8. Access to CCTV Footage

Access to CCTV footage is strictly controlled.

Routine access to live and recorded CCTV images is restricted to:

- Zoe Ramshaw – Headteacher
- Helen Carmel – Business Manager

These authorised members of staff are responsible for ensuring that CCTV footage is viewed only where there is a legitimate safeguarding, security, operational or legal reason.

No other member of staff is permitted to access CCTV footage without the prior authorisation of the Headteacher or Business Manager.

Where either authorised member of staff is unavailable and urgent access to CCTV footage is required for safeguarding purposes, arrangements will be made through the Business Manager, the Headteacher or the most senior available leader, with the reason for access fully documented.

Authorised Access

CCTV footage may be viewed where necessary to:

- investigate safeguarding concerns;
- investigate accidents or health and safety incidents;
- investigate complaints;
- investigate allegations involving pupils, staff or visitors;
- investigate behavioural incidents;
- investigate criminal damage, theft or trespass;
- support disciplinary or grievance investigations;
- respond to requests from the police or other authorised agencies;
- fulfil legal obligations under UK GDPR or other legislation.

Every occasion on which CCTV footage is accessed should be recorded.

The access log will include:

- the date and time;
- the person accessing the footage;
- the reason for access;
- the footage viewed; and
- whether any copies were made or shared.

Maintenance Access

From time to time, authorised maintenance personnel or technical support providers may require temporary access to the CCTV system for maintenance, repairs, software updates or fault diagnosis.

Such access will:

- only be granted with the permission of the Headteacher or Business Manager;
- be limited to the minimum access required;
- be supervised where appropriate; and
- not permit the viewing, copying or disclosure of CCTV footage unless this is necessary for the authorised work being undertaken.

Where external contractors require access, they will be expected to comply with the school's confidentiality, cyber security and data protection requirements.

Disclosure of Footage

CCTV footage will only be disclosed where there is a lawful basis to do so.

This may include disclosure to:

- the police;
- safeguarding agencies;
- the courts;
- insurers;
- the Information Commissioner's Office;
- individuals exercising their rights under UK GDPR.

All disclosures will be authorised by the Headteacher or Business Manager and recorded appropriately.

9. Access Requests and Disclosure of CCTV Footage

CCTV footage is the property of Orange Tree School and will only be viewed, copied or disclosed where there is a lawful basis for doing so.

Requests to access CCTV footage must be referred immediately to Helen Carmel (Business Manager) or the Headteacher.

The school may disclose CCTV footage where appropriate to:

- the police;
- children's social care;
- safeguarding partners;
- the Information Commissioner's Office (ICO);
- insurers;
- legal representatives;
- the courts;
- other organisations where required by law.

Individuals may request access to CCTV images of themselves by submitting a Subject Access Request (SAR). All such requests will be managed in accordance with the School's Data Protection Policy and supported by the Data Protection Officer where required.

Where CCTV footage contains images of other identifiable individuals, the school will consider whether disclosure is lawful and proportionate. This may include redaction, partial disclosure or refusal where permitted by law.

All disclosures of CCTV footage will be recorded, including:

- the date of disclosure;
- the recipient;
- the lawful basis for disclosure;
- the footage disclosed; and
- the authorising member of staff.

10. Privacy and Data Protection

The operation of CCTV forms part of the school's wider information governance framework.

Orange Tree School will ensure that:

- CCTV footage is processed in accordance with UK GDPR and the Data Protection Act 2018;

- appropriate privacy information is made available to pupils, parents, staff and visitors;
- CCTV recordings are retained only for as long as necessary;
- recordings are stored securely and protected from unauthorised access;
- appropriate technical and organisational measures are maintained to protect recorded images.

The school will periodically review the operation of its CCTV system to ensure that surveillance remains necessary, proportionate and effective.

Where significant changes are made to the CCTV system, the school will consider whether a Data Protection Impact Assessment (DPIA) is required.

11. Artificial Intelligence

Orange Tree School recognises that advances in Artificial Intelligence (AI) create new opportunities and risks in relation to CCTV footage.

Accordingly:

- CCTV recordings must not be uploaded to publicly available AI platforms;
- CCTV images must not be analysed using unauthorised AI software;
- any use of AI technologies in relation to CCTV will only take place where approved by the school, lawful, proportionate and consistent with data protection legislation.

The school will keep developments in AI under review and update this policy where necessary.

12. Complaints

Anyone wishing to raise concerns about the operation of the School's CCTV system should do so in the first instance with the Headteacher.

Complaints relating to the handling of personal data or CCTV footage will be managed in accordance with the school's:

- Complaints Policy;
- Data Protection Policy; and
- relevant statutory procedures.

Individuals also have the right to raise concerns with the Information Commissioner's Office where they believe their personal data has not been handled appropriately.

13. Monitoring and Review

The Headteacher has overall responsibility for ensuring that the School's CCTV system is operated lawfully, proportionately and in accordance with this policy.

Day-to-day operational oversight is delegated to Helen Carmel (Business Manager), who is responsible for ensuring that:

- the CCTV system remains compliant with legal and regulatory requirements;
- access to CCTV footage is appropriately authorised and recorded;
- retention periods are monitored;
- faults or maintenance issues are addressed promptly;
- staff understand their responsibilities in relation to CCTV.

The Headteacher and Business Manager will review the operation of the CCTV system periodically to ensure it continues to meet the school's safeguarding, security and operational needs.

The Data Protection Officer will provide independent advice where required, particularly in relation to:

- Subject Access Requests;
- complaints relating to CCTV;
- disclosure of recordings;
- significant changes to the CCTV system;
- data protection compliance.

This policy will be reviewed annually, or sooner following:

- changes in legislation or statutory guidance;
- significant changes to the CCTV system;
- recommendations arising from a safeguarding review;
- a significant data protection or security incident;
- recommendations from the Data Protection Officer or the Advisory Board.

14. Related Policies

This policy should be read alongside the following School policies and procedures:

- Data Protection Policy
- Cyber Security Policy
- Online Safety Policy
- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Mobile Phone and Personal Devices Policy

- Complaints Policy
- Privacy Notices
- Records Retention Schedule
- Information Sharing Guidance (where applicable)

Appendix A – CCTV Access Log

CCTV Access Log

Date	Time	Person Accessing Footage	Authorised By	Reason for Access	Footage Copied?	Shared With

Every occasion on which CCTV footage is viewed, copied or disclosed by authorised personnel must be recorded using this log and retained securely by the Business Manager in accordance with the School's Data Protection Policy and Records Retention Schedule.