



Loughborough
Schools Foundation

Nursery • Fairfield • Grammar • High

CCTV (Video Surveillance) Policy

Document Management Information

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Policy Author:	James Leeson, Data Protection Officer
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Revision History

Version	Description of Revision	Date Approved
3.11	Reviewed, no updates made.	February 2023
4.0	Adopted ISBA guidance and policy notes.	July 2025

About this Policy

The Loughborough Schools Foundation (the **School**) uses CCTV cameras to view and record pupils, parents, staff and visitors on and around our premises. We recognise that the images of individuals recorded by CCTV cameras are personal data which must be processed in accordance with data protection laws.

The purpose of this policy is to:

- outline why and how we will use CCTV, and how we will process personal data recorded by CCTV cameras;
- ensure that the legal rights of our pupils, parents, staff and visitors relating to their personal data are recognised and respected; and
- assist staff in complying with relevant legal obligations when working with personal data.

A breach of this policy may, in appropriate circumstances, be treated as a disciplinary matter. Following investigation, a breach of this policy may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

The CCTV system is administered and managed by the School, which is the controller in respect of personal data collected by our CCTV cameras. If you have any questions about this policy, please contact the Data Protection Officer at dataprotection@lsf.org.

This policy will be subject to review from time to time and should be read with reference to the School's Data Protection Policy and Privacy Notices. We will also review the ongoing use of existing CCTV cameras regularly to ensure that their use remains necessary and appropriate, and that the system is continuing to address the needs that justified its introduction.

Objectives

The School's purposes for 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.

- To protect pupils, parents, staff and visitors with regard to their personal safety and to act as a deterrent against crime.
- To protect the School buildings and equipment, and the personal property of pupils, parents, staff and visitors from damage, disruption, vandalism and other crime.
- To prevent and detect crime, and support law enforcement bodies in the prevention, detection and prosecution of crime as well as the identification and apprehension of offenders.
- To monitor the security and integrity of the School site and deliveries and arrivals, including car parking.
- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the School's rules, which are available to parents and pupils on request.
- To assist in day-to-day management, including ensuring the health and safety of pupils, parents, staff and visitors.
- To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
- To assist in civil litigation, including employment tribunal proceedings.

Please note that this list is not exhaustive, and other purposes may become relevant from time to time.

Positioning

Locations for the CCTV cameras have been selected, both inside and outside our premises, that the School reasonably believes require monitoring to address the above objectives. See Appendix A (below) for a list of current camera locations on the School premises.

Adequate signage has been placed in prominent positions around the premises to inform pupils, parents, staff and visitors that they are entering a monitored area, identifying the School as the controller operating the CCTV system and including contact details for further information regarding the CCTV system.

These locations have been chosen to minimise viewing of spaces not relevant to the legitimate purposes of the School's monitoring. As far as practically possible, CCTV cameras will not focus on private property; and no images of public spaces will be captured except to a limited extent at site entrances. In addition, surveillance systems will not be used to record sound and no images will be captured from areas in which individuals would have a heightened expectation of privacy, including medical, changing and washroom facilities.

Maintenance

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

Authorised personnel will check and confirm that the CCTV system is properly recording and that cameras are functioning correctly, on a regular basis.

The CCTV system will be checked and (to the extent necessary) serviced no less than annually.

Supervision

We will ensure that recorded images are only viewed by approved members of staff whose roles require them to have access to such data. This may include security, HR and safeguarding / pastoral staff. Staff using the CCTV system will be given appropriate training to ensure that they understand and observe the legal requirements related to the processing of relevant data.

Images will only be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

Storage

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered by CCTV cameras is stored in a way that maintains its integrity and security. Given the large amount of data generated by the CCTV system, we may store video footage using a cloud computing system. We will take all reasonable steps to ensure that any cloud service provider maintains the security of our information, in accordance with industry standards. We may also engage data processors to process data on our behalf. We will ensure appropriate contractual safeguards are in place to protect the security and integrity of the data.

Images will be stored for 28 days, and automatically over-written unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required to retain such data (for example, by an appropriate third party such as the police or local authority, or as part of a civil case).

Where personal data collected by the CCTV system is retained, it will be held in accordance with data protection law and our Data Protection Policy.

Requests for disclosure

Individuals have the right to request access to personal data that the School holds about them (otherwise known as a "subject access request", on which please see the School's Privacy Notice and Data Protection Policy for further information), including information collected by the CCTV system, if it has been retained.

In order to respond to a subject access request, the School will require specific details including (as a minimum) the 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.

The School must also be satisfied as to the identity of the person wishing to view stored images and the legitimacy of their request.

No images from our CCTV cameras will be disclosed to a third party without express permission being given by the School. The following are examples of circumstances in which the School may authorise disclosure of CCTV images to third parties:

- Where required to do so by the police or any relevant local or statutory authority;
- To make a report regarding suspected criminal behaviour or a safeguarding incident;
- To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the pupil's parents/guardian will be informed as part of the School's management of a particular incident;
- To individual data subjects (or their legal representatives) pursuant to a subject access request (as outlined above);
- To the School's insurance company where required in order to pursue a claim (for example for damage to insured property); or
- In any other circumstances required under law or regulation.

Where images are disclosed, a record will be made in the system logbook 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).

The School reserves the right to obscure images of third parties when disclosing CCTV footage, where we consider it necessary to do so.

Complaints and queries

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 Data Protection Officer at dataprotection@lsf.org.

For any other queries concerning the use of your personal data by the School, please see the School's applicable Privacy Notice.

Legislation

The main legislation in this area is the Data Protection Act 2018, the UK General Data Protection Regulation, and the Education (Independent School Standards) Regulations 2014. Other legislation not directly relevant to independent schools, but applicable to general principles, include the Regulation of Investigatory Powers Act 2000 and the Protection of Freedoms Act 2012.

Relevant guidance which has informed this Policy includes:

- The ICO Code of Practice on Privacy Notices
- The ICO Guide to Privacy Notices under GDPR
- The ICO Guidance on video surveillance (including CCTV)
- The ICO's Guide to Data Protection
- The ICO's Guide to the General Data Protection Regulation

- The Government's Surveillance Camera Code of Practice (which is only directly applicable to public authorities but represents good practice in the private sector).

Appendix A – List of CCTV Locations on the School campus

School	Location / Description
LSF	85 Castledine Street 1
LSF	85 Castledine Street 2
FFD	FFD Double A6 Gate
FFD	FFD Exit To Car Park
FFD	FFD Gallery External
FFD	FFD Kindergarten A6
FFD	FFD Kindergarten Dining Room
FFD	FFD Kindergarten Woodland
FFD	FFD Quad
FFD	FFD Reception External
FFD	FFD Reception Internal
FFD	FFD Server Room
FFD	Forest School 1
FFD	Forest School 2
LSF	Hahn House Front Entrance
LSF	Hahn House Rear Entrance
LSF	Hahn House Road
LAS	LAS Kitchen Gate
LAS	LAS Library Entrance Camera
LAS	LAS Locker Room Front
LAS	LAS Locker Room Rear
LAS	LAS Main Entrance
LAS	LAS Prep Playground
LAS	LAS Science Corridor
LAS	LAS Science Entrance
LAS	LAS Science Outside Cleaning Cupboard
LAS	LAS Six Form Common Room Camera
LAS	LAS Year 10-11 Common Room Camera
LAS	LAS Year 7 Common Room Camera
LAS	LAS Year 8 Common Room Camera 1
LAS	LAS Year 8 Common Room Camera 2
LAS	LAS Year 9 Common Room Camera
LGS	LGS Burton Hall External
LGS	LGS C3
LGS	LGS CCF 1
LGS	LGS CCF 2
LGS	LGS CCF Outbuildings
LGS	LGS CDT Car Park
LGS	LGS Chemistry Axis Encoder
LGS	LGS Edge of Library
LGS	LGS Hodson Hall Entrance
LGS	LGS Hodson Hall Gate
LGS	LGS Hodson Hall Link
LGS	LGS L4 Camera
LGS	LGS L5 Camera
LGS	LGS Murray Entrance 1
LGS	LGS Murray Entrance 2

LGS	LGS Murray External
LGS	LGS Norman Walters Front Lobby Camera
LGS	LGS Norman Walters Rear Lobby Camera
LGS	LGS Parcel Room
LGS	LGS Physics Front
LGS	LGS Physics Lobby 1
LGS	LGS Physics Lobby 2
LGS	LGS Quad
LGS	LGS Quad Gate
LGS	LGS Queens Bathroom
LGS	LGS School House Drive
LGS	LGS School House Lawn
LGS	LGS Sixth Form Centre Corridor
LGS	LGS Sixth Form Centre Entrance
LGS	LGS Sixth Form Centre Ground Floor
LGS	LGS Sixth Form Centre Mezzanine
LGS	LGS Sixth Form Centre Stairs
LGS	LGS Sports Hall Front Entrance
LGS	LGS Sports Hall Rear Entrance
LGS	LGS Staff Room External
LGS	LGS Swimming Pool 1
LGS	LGS Swimming Pool 2
LGS	LGS Swimming Pool Entrance
LGS	LGS Tower Orangery
LGS	LGS Walks
LGS	LGS Workshop
LGS	LGS Wycliffe Room
LGS	LGS X and Y Block
LHS	LHS Burton Street
LHS	LHS Corridor
LHS	LHS Main Entrance
LHS	LHS Music Car Park
LHS	LHS Outside Reception 1
LHS	LHS Outside Reception 2
LHS	LHS Reception Internal
LHS	LHS Rokeby Outside Staffroom Camera
LHS	LHS Science Internal Front Entrance
LHS	LHS Science Internal Rear Entrance
LSF	LSF Bursary External 1
LSF	LSF Bursary External 2
LSF	LSF Friesland Gate
LSF	LSF Lodge A6
LSF	LSF Lodge Car Park
LSF	LSF Lodge Front Entrance
LSF	LSF Main Car Park
LSF	LSF Main Car Park Entrance 1
LSF	LSF Main Car Park Entrance 2
LSF	LSF Main Car Park Pillar 1
LSF	LSF Main Car Park Pillar 2
LSF	LSF Main Car Park Pillar 3

LSF	LSF Networks Server Room Camera 1
LSF	LSF Networks Server Room Camera 2
LSF	LSF Networks Workshop Camera
LSF	LSF Walks Bollard
LSF	LSF Walks Outside of Networks
LSF	LSF Yellow Barrier
LSM	LSM Astro Gate
LSM	LSM External Eadon Hall
LSM	LSM External Next to Parkin Sports Hall
LSM	LSM First Floor Lift
LSM	LSM First Floor Rear Stairs
LSM	LSM Front Stairs
LSM	LSM Ground Floor Lift
LSM	LSM Rear Entrance
LSM	LSM Rear Stairs
LSM	LSM to FFD Path External
LSF	Networks Axis Encoder 1
LSF	Networks Axis Encoder 2
LSF	Nursery Cloak Room
LSF	Nursery Corridor 1
LSF	Nursery Corridor 2
LSF	Nursery Dining Room
LSF	Nursery Entrance External
LSF	Nursery Entrance Internal
LSF	Nursery External Montessori Entrance
LSF	Nursery Gym Corridor
LSF	Nursery Gym Cut Through
LSF	Nursery Gym Double Doors Entrance
LSF	Nursery Internal Montessori Entrance
LSF	Nursery Montessori
LSF	Nursery Montessori Playground 1
LSF	Nursery Montessori Playground 2
LSF	Nursery Old Reception Door
LSF	Nursery Outside Seating Area
LSF	Nursery Playground
LSF	Nursery Room 1
LSF	Nursery Room 2
LSF	Nursery Room 3
LSF	Nursery Sports Hall
LSF	Nursery Toilets
LSF	Parkin Sports Fitness Suite 1
LSF	Parkin Sports Fitness Suite 2
LSF	Parkin Sports Fitness Suite Car Park
LSF	Parkin Sports Fitness Suite External
LSF	Parkin Sports Fitness Suite Internal
LSF	Extrance
LSF	Parkin Sports Hall Car Park 1
LSF	Parkin Sports Hall Car Park 2

<i>LSF</i>	Parkin Sports Hall External LHS Science
<i>LSF</i>	Parkin Sports Hall FFD Entrance External
<i>LSF</i>	Parkin Sports Hall FFD Internal Entrance
<i>LSF</i>	Parkin Sports Hall LHS Internal Entrance
<i>LSF</i>	Parkin Sports Hall Main Entrance External
<i>LSF</i>	Parkin Sports Hall Main Entrance Internal
<i>LSF</i>	Parkin Sports Hall Store Room External
<i>LSF</i>	Priest House Corridor 1
<i>LSF</i>	Priest House Corridor 2
<i>LSF</i>	Priest House Entrance Internal
<i>LSF</i>	Priest House External 1
<i>LSF</i>	Priest House External 2
<i>LSF</i>	Priest House Landing
<i>LSF</i>	Priest House Room 1
<i>LSF</i>	Priest House Room 2
<i>LSF</i>	Priest House Room 3
<i>LSF</i>	Priest House Room 4
<i>LSF</i>	Priest House Room 5
<i>LSF</i>	Priest House Room 6
<i>LSF</i>	Priest House Stairs

Document Control Table

Version	Date	Description of Changes	Author	Approved by	Effective Date
3.11	27 February 2023	No updates	Data Protection Officer	COO	1.3.23
4.0	27 February 2025	Adopted ISBA guidance and policy notes.	Data Protection Officer		