



KEW COLLEGE PREP

CCTV Policy

This policy applies to the whole school including the EYFS

This policy is published on the Kew College Prep website and is also available to parents from the School office upon request.

The policy is written with due regard to the following:

In the picture: A Data Protection Code of Practice for Surveillance Cameras and Personal Information Version 1.1 May 2015 (published by the Information Commissioners Office) Regulation of Investigatory Powers Act (RIPA) 2000; Data Protection Act 1998

See also the School's policies as follows:

Data Protection Policy

Definitions or abbreviations used in this policy

CCTV: Closed circuit television

Covert surveillance: any use of surveillance which is intentionally not shared with the subjects it is recording. Subjects will not be informed of such surveillance

DSL: Designated Safeguarding Lead – person responsible for safeguarding in school

Deputy DSL: Deputy Designated Safeguarding Lead – deputy person responsible for safeguarding in school

EYFS: Early Years Foundation Stage

LADO: Local Authority Designated Officer for safeguarding of children (also known as the Designated Officer in some authorities)

The School: Kew College Prep

1. Introduction

- 1.1. Kew College Prep uses closed circuit television (CCTV) images to reduce crime and monitor the School buildings and vehicles 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. The system comprises nine dome cameras, three located at the front of 24-26 Cumberland Road covering the forecourt and front door, one located on the side of the Octagon building covering the gates between the playground and Attwood's Alley, four on the walls of the Sedum building covering the slope and steps to the entrance, the perimeter wall and both doors; and one on the front of Upton covering the front garden. There is also a dashboard camera in the minibus.
- 1.3. The system has some sound recording capability, with the exception of the camera in the minibus where the audio function is disabled
- 1.4. The CCTV system is owned and operated by the School, the deployment of which is determined by the School's Senior Leadership Team.

- 1.5. The CCTV on all three sites, is monitored centrally from the School offices by the School Secretary. The Head, Bursar, IT Manager and Caretaker also have monitoring access. The IT Manager will perform a high-level review of the data from the camera in the minibus once per week; any in depth reviews will be conducted in accordance with sections 6 and 8 of this policy.
- 1.6. The staff and the school community are informed of the introduction of, or changes to, CCTV monitoring.
- 1.7. The School's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images and any sound recordings is covered by the Data Protection Act 1998. This policy outlines the School's use of CCTV and how it complies with the Act.
- 1.8. All authorised operators and employees with access to images are aware of the procedure that needs to be followed when accessing the recorded images and sound. All operators are trained by the IT Manager in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.
- 1.9. The aims that the School wishes to address have been clearly defined in 1.1 above and installing cameras is the best solution. This decision will be reviewed on a regular basis (See **Appendix 1**).

2. Statement of Intent

- 2.1. The School complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.
- 2.2. CCTV warning signs are clearly and prominently placed at all external entrances to the school, including school gates - coverage includes outdoor areas. Signs contain details of the purpose for using CCTV (see **Appendix 2**). In areas where CCTV is used, the school has ensured that there are prominent signs are placed at both the entrance of the CCTV zone and within the controlled area. Signs are also placed in the minibus to face both internally and externally.
- 2.3. The planning and design of the CCTV system and location of the monitors has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

3. Siting the Cameras

- 3.1. Cameras are sited so they only capture images relevant to the purposes for which they are installed (described above) and care has been taken to ensure that reasonable privacy expectations are not violated. The School has ensured that the location of equipment is carefully considered so that images captured comply with the Data Protection Act.

- 3.2. The School has made every effort to position cameras so that their coverage is restricted to the School premises, which may include outdoor areas.
- 3.3. CCTV will not be used in classrooms.
- 3.4. Members of staff have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert surveillance.

4. Covert Surveillance

- 4.1. Kew College Prep does not condone the use of covert surveillance, but it may be operable in exceptional circumstances. For example:
 - Where there is good cause to expect that an illegal action is taking place; and
 - Where notifying the individual about the surveillance would seriously prejudice the reason for the surveillance eg to enable the DSL or Deputy DSL to examine behaviour which may give rise to any reasonable safeguarding concern
- 4.2. In these circumstances the School would not act without the written advice or recommendation of the relevant public authority eg LADO or the police
- 4.3. Covert monitoring must cease following completion of an investigation
- 4.4. Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private e.g. toilet cubicles.

5. Storage and Retention of CCTV images

- 5.1. Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.
- 5.2. All retained data will be stored securely.

6. Access to CCTV images

- 6.1. Access to recorded images is restricted to the Head, the Bursar, the Caretaker, the IT Manager, the DSL and the School Secretary and will only be accessed when there are grounds to suspect a crime or unsafe practice has occurred. Access will not be made more widely available other than when required in Section 8.1 below.

7. Subject Access Requests (SAR)

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

- 7.2. All requests should be made in writing to the Head. 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.
- 7.3. The School shall respond to such requests within one month of the Head receiving the written request. No charge will be applied to process the request.
- 7.4. The School reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

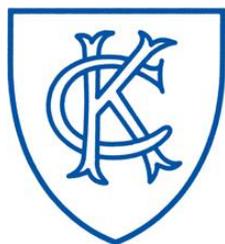
8. Access to and Disclosure of Images to Third Parties

- 8.1. There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the School where these would reasonably need access to the data (e.g. investigators).
- 8.2. The data may be used within the School's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.
- 8.3. Where images are provided to third parties, wherever practicable steps will be taken to obscure images of non-relevant individuals.

9. Complaints

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

Approved by:	Updated by:
Title: Head	Title: Privacy Officer
Date: 02 February 2026	Date: 30 January 2026



Appendix 1

KEW COLLEGE PREP

Checklist for users of limited CCTV systems monitoring school premises

This CCTV system and the images produced by it are controlled by the IT who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998).

Kew College Prep has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of the pupils at Kew College Prep. It will not be used for other purposes. We review our use of CCTV on a regular basis (see 1.9).

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	12 Sep 17	Bursar	N/A
There is a named individual who is responsible for the operation of the system.	May 25	Bursar	May 27
The problem we are trying to address has been clearly defined above and installing cameras is the best solution. This decision is reviewed on a regular basis.	May 25	Bursar	
A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	May 25	IT Manager	
Cameras have been sited so that they provide clear images.	May 25	Bursar	
Cameras have been positioned to minimise capturing the images of persons not visiting the premises.	May 25	Bursar	
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	May 25	Bursar	
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	May 25	IT Manager	
The recorded images will only be retained long enough for any incident to come to light (eg for a theft to be noticed) and the incident to be investigated.	May 25	IT Manager	
Except for law enforcement bodies, images will not be provided to third parties.	May 25	IT Manager	
The potential impact on individuals' privacy has been identified and taken into account in the use of the system.	May 25	Bursar	
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the IT Manager knows to seek advice from the Information Commissioner as soon as such a request is made.	May 25	Bursar	
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	May 25	IT Manager	

Please keep this checklist in a safe place until the date of the next review.



KEW COLLEGE PREP

CCTV Signage

It is a requirement of the Data Protection Act 1998 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for enquiries



Images are being monitored and recorded for the purposes of crime prevention and the safety of our pupils.

This scheme is controlled by Kew College.

For more information call 020 8940 2039