

CLOSED CIRCUIT TELEVISION (CCTV) and SMART DOORBELL POLICY


September 2025

Policy Review

This policy will be reviewed in full by the Directors on an annual basis unless circumstances require policy update in the interim.

The policy was last reviewed and agreed by the Directors on 01.09.2025.

It is due for review on 01.09.2026 (up to 12 months from the above date).

Signature (CEO): 

Date: 01.09.2025

Signature (COO): 

Date: 01.09.2025

Version Control

Version	Date	Changes
V1	04.09.2023	Original document
V2	01.09.2024	Terminology and layout update
V2	01.09.2025	Layout update

CCTV System: The Closed-Circuit Television (CCTV) system is used by our landlord (Planetary Business Centre) and monitors the entrance to the building.

Ring Smart Doorbell and Reception Camera System: Edit Education have a Ring smart doorbell located externally next to the front door for students, parents, visitors and volunteers to use. We also have a connected Ring camera located within our enclosed reception area. Both the smart doorbell and reception camera have the capability to record sound.

1. PURPOSE

Both the CCTV and smart doorbell systems are installed for the purpose of enhancing security of the building and its associated equipment as well as creating a safe environment for staff, students, parents and visitors.

CCTV surveillance at the Provision is intended for the purposes of:

- protecting the Provision buildings and provision assets, both during and after provision hours.
- promote the safeguarding of staff, students, parents and visitors during procedures such as visitors signing in and students handing over their phone as they enter the provision.
- promoting the health and safety of staff, students and visitors as well as for monitoring student behaviour as they enter and leave the provision.
- preventing bullying.
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
- supporting the police in a bid to deter and detect crime.
- assisting in identifying, apprehending and prosecuting offenders.
- ensuring that the provision rules are respected so that the provision can be properly managed.

The Closed-Circuit Television (CCTV) system is owned by our landlord and monitors the entrance to the building. Edit Education will only request access to the CCTV in the event of criminal activity impacting on Edit Education. It is installed to provide a safe and secure environment. In the event of any criminal activity the system will be used fairly, within regulatory guidelines and law, with the personal privacy of individuals using the building and the objective of recording incidents for safety and security in mind.

2. SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. The landlord and provision comply with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use.

CCTV warning signs will be clearly and prominently placed at the main entrance to the Provision.

The planning and design have endeavoured to ensure that the system will give maximum effectiveness and efficiency, but it is not guaranteed that the system will cover or detect every single incident taking place in the areas of coverage.

CCTV monitoring will never be used in any observing or monitoring a member of staff's performance.

Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulation and Data Protection Act 2018.

3. LOCATION OF CAMERAS

The cameras are sited so that they only capture images relevant to the purposes for which they have been installed (as described above), and care will be taken to ensure that reasonable privacy expectations are not violated. The Provision will ensure that the location of equipment is carefully considered to ensure that the images captured comply with the legislation. The Provision will make every effort to position the cameras so that their coverage is restricted to the Provision premises, which includes both indoor and outdoor areas.

CCTV will NOT be used in the workshop, classroom, office, prep room or downtime room.

4. ACCESS TO RECORDED IMAGES

Access to recorded images will be restricted to the staff authorised to view them and will not be made widely available. Supervising the access and maintenance of the Ring smart doorbell system is the responsibility of the COO.

5. SUBJECT ACCESS REQUESTS (SAR)

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the GDPR.

All requests should be made in writing to the Data Protection Officer. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location.

The applicant may view the CCTV footage if available.

The Provision will respond to requests within 30 days of receiving the request.

The Provision 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.

6. ACCESS AND DISCLOSURE OF IMAGES TO THIRD PARTIES

There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police.

If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However, very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

Requests for images should be made in writing to the Data Protection Officer.

7. RESPONSIBILITIES

The COO will:

- Ensure that the use of CCTV and Ring smart doorbell systems is implemented in accordance with this policy.
- Oversee and co-ordinate the use of CCTV and Ring smart doorbell monitoring for safety and security purposes within the Provision.
- Ensure that all existing CCTV and Ring smart doorbell monitoring systems will be evaluated for compliance with this policy.
- Ensure that the CCTV and Ring smart doorbell monitoring is consistent with the highest standards and protections.

- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.
- Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system.
- Ensure that monitoring recorded tapes are not duplicated for release.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally.
- Consider both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the Provision and be mindful that no such infringement is likely to take place.
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy”.
- Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only.
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 31 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil).
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage and for safeguarding reasons and not to monitor individual characteristics.
- Ensure that camera control is not infringing an individual’s reasonable expectation of privacy in public areas.

8. DATA PROTECTION IMPACT ASSESSMENTS AND PRIVACY

CCTV has the potential to be privacy intrusive. The Provision will perform a Data Protection Impact Assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and address a pressing need identified.

9. POLICY REVIEW

The Data Protection Officer is responsible for monitoring and reviewing this policy. This policy will be reviewed annually. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.