

# CCTV POLICY

Company Operations

ADO Services C.I.C.

Incorporating ADO River Valley

Version 1.0 ©2026

Next Review Date August 2026

2025-2026

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|---|-----------------|
| Last Ratification<br>By Management<br>Committee | New Policy      |
| Next Review By<br>Management<br>Committee       | September 2026  |
| Latest Update by<br>ADO River Valley            | January<br>2026 |

## 1. Policy Overview

The purpose of this Policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system at ADO River Valley School. The CCTV system is owned by Kylanja Ltd, our managed service providers. On a day-to-day basis, cameras are monitored by nominated Senior Management and appointed administrative staff, along with those individuals directly involved with the security of the school site. Recorded images from any camera can only be accessed with express permission from the Head Teacher, Proprietor or the designated security team. The systems will not be used for any other purpose other than those set out in this document without prior consultation with the Head Teacher, and where appropriate, notification to staff. This Policy has been drafted in compliance with the requirements of the General Data Protection Regulation (GDPR). The ongoing suitability of the School's CCTV Policy will be reviewed annually by the School Management Committee. The system is registered with the Information Commissioners Office (ICO)

## 2. Scope

This Policy covers the use of CCTV systems on the school site, which capture moving and still images of people who could be identified, for the following purposes;

- To protect school buildings, and their assets within.
- To monitor arrivals at the customer and student receptions.
- To monitor school car park use and identify any unauthorised parking.
- To monitor deliveries to the school.
- To increase personal safety of staff, students and those visiting the school.
- To capture intruders to the school grounds both within and out of hours.
- To protect animals and equines welfare and security.
- To act as a deterrent for bad, anti-social or violent behaviour and damage to the school or its assets.
- To support the Police in a bid to deter and detect crime if required.
- To assist in identifying, apprehending and disciplining offenders.

## 3. Policy Statement

The school will treat the CCTV system and all information, documents and recordings obtained and used as data, which are protected by the GDPR, and will be processed in accordance with the requirements of the regulation. Cameras will be used to monitor

activities within allocated areas in and around the school to identify criminal activity occurring, anticipated or perceived, and in order to ensure the safety and wellbeing of the school, its staff and students. The school will only operate overt surveillance and will display signs in the areas of the school where this is in operation. Covert surveillance (i.e. which is intentionally not shared with the individuals being recorded) is not condoned by the school. Warning signs, have been placed at all access routes to areas covered by the school CCTV, as required by the Code of Practice of the Information Commissioner. The CCTV system will not be trained on individuals unless an immediate response to an incident is required. The CCTV system will not be trained on private vehicles or property outside the perimeter of the school.

#### **4. CCTV Operations**

The CCTV operations and the data collected will adhere to the guidelines and requirements of the GDPR.

Access to the CCTV system, software and data, will be strictly limited to authorised operators and is password protected. The CCTV system will be in operation for 24 hours a day, 365 days a year. The system will record audio. The responsibility of the day-to-day leadership and management of the CCTV system is that of the Head of Security representing the school and the Head Teacher. The system will be managed by Kylanja Ltd in accordance with the principles and objectives expressed in this Policy. The day-to-day administration of the system will be the responsibility of Kylanja Ltd during the day, out of hours and at weekends.

Kylanja Ltd will check and confirm the efficiency of the system regularly and in particular, to confirm that the equipment is properly recording and that cameras are functional. All staff involved with the operation of the CCTV system are properly trained and fully understand their roles and responsibilities in respect of data protection.

Access to the CCTV 'viewing monitors-apps' will be limited to selected administrative staff together with those directly involved in the security of the school. Staff, visitors and others entering areas with CCTV viewing monitors will be subject to particular arrangement as outlined below. Authorised staff will satisfy themselves over the identity of visitors to the area and the purpose of their visit. Operations of the equipment will be managed with the minimum of disruption. Casual observations will not be permitted. If an emergency arises out of hours, authorised staff will have permission to view or process recorded material and flag or raise alarms. Incidents involving the Emergency Services will be notified to the Security Team, Head Teacher and Proprietor.

## 5. Monitoring Procedures

Camera surveillance will be maintained at all times. Images will be continuously recorded or when activated by movement in their respective fields of vision. No covert monitoring will be undertaken until the circumstances have been considered by, and written authorisation obtained from The Proprietor as a final stage of escalation.

## 6. Recording Procedures

In order to maintain and preserve the integrity of the recorded material used to record events from the CCTV system and the facility to use them in any future proceedings, the use and retention will be strictly adhered to by the [Privacy Policy](#).

Recorded materials may be viewed by or released to third parties, only in the following prescribed circumstances, and then only to the extent required by law:

- The Police, where any images recorded would assist in a specific criminal inquiry.
- Prosecution agencies, such as the Crown Prosecution Service (CPS).
- Relevant legal representatives such as lawyers and barristers where warrants have been issued.
- Persons whose images have been recorded and retained, and where disclosure is required by virtue of data protection legislation, or the Freedom of Information Act.

A record will be maintained of the release of recorded materials to the Police or other authorised applicants. A register, maintained by the Controller will be made available for this purpose. Viewing of recorded materials by the Police will be recorded in writing and recorded in the Incident Form on Arbor.

Recorded materials will be released to the Police but will remain the property of the school, and both the recorded material and information contained on it are to be treated in accordance with this document. The school retains the right to refuse permission for the Police to pass to any other person, the recorded material or any part of the information contained thereon. Upon a court of law request the release of an original recorded material will be produced from the secure recorded material store, complete in its sealed bag. If the

Police require the school to retain the stored recorded materials for use as evidence in the future, such recorded materials will be properly indexed and properly and securely stored until they are required by the Police. Requests for access or disclosure will be recorded and the Proprietor will make the final decision as to whether the recorded images may be released to persons other than the police.

### **6.1 Retention Period**

Recorded material under any of those circumstances listed above will follow the procedures within the Privacy Policy, unless determined by legal or Police requests and challenges.

## **7. Security**

The CCTV camera system is integrated into a secure base station. Each individual camera communicates with the base station through an encrypted wireless service, where individual internet addresses of each camera are hidden from the ADO internal network.

This security means that none of the cameras can be hacked to gain access.

The main application controlling the base station and cameras has two factor authentication protected from interference and hacking.

Each camera relies on the base station to work and will not work if detached from the base station network.

This security aspect eliminates cyber security intrusions onto the camera system.

Any changes to the CCTV system configuration or security settings will be subject to a Data Protection Impact Assessment.

## **8. Access By The Data Subject**

The GDPR provides Data Subjects (individuals to whom "personal data" relates) with a right to data held about themselves, including those obtained by CCTV. Individuals have the right to submit a subject access request in order to gain access to their personal data. If the data subject is not the focus of the footage i.e. there are more individuals visible, or the data subject has not been singled out, or had their movements tracked then the images are not classed as 'personal data'. Therefore, the individual is not entitled to the image under the provisions of Subject Access Requests. In such instances, the school will verify the identity of the individual making the request before any information is provided. All requests will be responded to without delay, and at the most within one calendar month. Requests for

access or disclosure will be recorded and the Proprietor will make a final decision as to whether recorded images may be released to persons other than the police.

## 9.Review

All ADO River Valley policies and procedures follow ITIL guidelines to ensure version control, change control and release management of any documents. As a matter of policy, documents can be updated at any time to reflect changes to ADO River Valley procedures, legal changes, OFSTED directives or any other reason to ensure the policies and procedures are accurate and correct. This involves consultation with stakeholders and approval from the directors and the ADO River Valley governance committee. All policies and procedures are reviewed at the very least on an annual basis. Regular communication through newsletters, social media, text systems and through our website within the ADO River Valley Library is part of our Release Management.

## 10.Contact

This document was produced by the ADO RV Operations Consultancy Team (Kylanja Ltd). This version supersedes any previous versions and will be reviewed annually.

All correspondence with regard to this policy, or any other operational policy and procedure should be directed to the ADO RV Business Manager by e-mailing [education@adorivervalley.co.uk](mailto:education@adorivervalley.co.uk) or calling 0208 855 6778, requesting to speak to the Business Manager or in writing to ADO River Valley School, Main Office, 126 Upper Wickham Lane, Welling, Kent, DA16 3DP.