



CCTV POLICY

Policy Custodians: Senior Master

Approving Body: MTS Senior Leadership Team

Approved: May 2025

(This policy does not apply to Merchant Taylors' Prep)

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) Network at Merchant Taylors' School (it does not extend to Merchant Taylors' Prep). It also serves as a notice and a guide to data subjects (including pupils, parents, staff, governors, volunteers, visitors to the School and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the **System**).

The System is administered and managed by the School, who acts as the Data Controller. This policy will be subject to review from time to time, and should be read with reference to the School's Data Protection Policy. For further guidance, please review the [Information Commissioner's CCTV Code of Practice](#).

All fixed cameras are in plain sight on the School premises and the School does not use CCTV for covert monitoring of individuals or monitoring of private property outside the School grounds.

The following locations for the CCTV cameras used by Merchant Taylors' School are listed below:

External Locations

Automatic Number Plate Recognition (ANPR) in addition to CCTV cameras positioned on entry to the site via the East Drive and West Gate

The open outdoor area bordered by the Catering and Maintenance Departments and the Sports' Hall

Bicycle sheds next Biology Department

Catering Deliveries Entrance

Contractors Gravel Car Park

Delivery Depot Courtyard

Drama Entrance

Design Centre Car Park

Exterior to Exam Hall (Rose Garden)

Flagstaff 1st XV Rugby Pitch as seen from Clock Tower and the Maths Office

Gates – Inner Perimeter (Bursar's House, CCF, DT Pedestrian, Geography, Head Master's, Physics, Squash Courts)

Geography Building Entrance

Grounds Department Buildings

Head Master's Quad

Julian Hill Cricket Centre external

Maintenance Department Yard Entrance

Manor and Nursery Playground

Manor Car Park

Modern Languages Courtyard

Music Department – two cameras on Thomas White Drive covering "The Beast" and the Front Entrance of the school

MTS Cricket Pavilion

Old Merchant Taylors' War Memorial Club House Car Park

Old Merchant Taylors' Cricket Pavilion
Parade Ground Quad
PE Office Entrance (from Old Swimming pool area)
Swimming Pool Courtyard Entrance, OMT gate
Warrior Pavillion
West Gate Entrance to School Site

Internal

Archive
Biology Foyer (modular build)
Catering Department facing Catering Manager's office entrance by the signing in/out machine
Classrooms: Art IT room, Co50, Co51, Gy 2.1, Gy 2.2, Gy2.3, Gy 3.2, Ph15
Delivery Depot camera on entrance door and shutters to monitor delivery drivers/external visitors
Design Technology Department
Geography Fire Exit onto Parade Ground Quad
Gown Room/Post Area
Gym (Weights Room)
Gym (Fitness Suite)
History Department front entrance foyer and rear entrance foyer
Julian Hill Cricket Centre internal
Learning Support Offices
Library
Locker Rooms
Lun cafe
Music Department Entrance
SCR corridor by SCR focused on security door
Table Tennis (Great Hall stairwell) Lobby
Reception Foyer
SCR Bar Area
Sixth Form Common Room
Sports Hall
Surgery Waiting Area

Stand Alone Systems – not networked and separate from the networked cameras

Tolpits House
Watersports Centre

The School's purposes of 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.

1. Objectives of the System

- 1.1 To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 1.2 To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public. This would be unlikely to extend to lost property investigations where the owner of the "lost property" had not taken reasonable precautions to secure the property in the first instance.
- 1.3 To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.

- 1.4 To monitor the security and integrity of the School site and deliveries and arrivals.
- 1.5 To monitor the safety of employees, volunteers and contractors while carrying out School-related work duties.
- 1.6 To monitor and uphold discipline among pupils in line with the School Rules, which are available to parents and pupils on request.
- 1.7 To provide clarifying evidence where possible in cases where grievances or complaints are made by individuals while on-site at the School.

2. Positioning

- 2.1 Locations have been selected, both inside and outside, that the School reasonably believes require monitoring to address the stated objectives.
- 2.2 Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.
- 2.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, such as showers or washroom facilities.
- 2.4 No images of public spaces outside the School grounds will be captured except to a highly limited extent at main site entrances.

3. Maintenance

- 3.1 The CCTV System will be operational 24 hours a day, every day of the year.
- 3.2 The IT/Technical Services Department will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
- 3.3 The System will be checked and (to the extent necessary) serviced no less than annually.

4. Supervision of the System

- 4.1 Staff authorised by the School to conduct routine supervision of the imagery obtained from inward facing cameras will initially include members of the IT/Technical Services Department, members of the School Leadership Team, day or night security and duty staff and members of the Bursar's Department including the School Reception Team and Catering Manager. The list of people permitted to view the CCTV footage can temporarily and extraordinarily be increased upon application to the Second Master or Senior Master.
- 4.2 For the purpose of ensuring site security, the School uses externally facing cameras. The imagery obtained by these cameras is accessible to the Head Porter (Head of Security), the Head of Lettings, the Catering Manager, the School Reception Team (only view live footage) and those who work in the Bursar's Office. Technical Services manage these cameras and can view them.
- 4.3 Images are viewed and/or monitored in suitably secure and private areas to minimise the likelihood of opportunity for access by unauthorised persons.

5. Storage of Data

- 5.1 The day-to-day management of images will be the responsibility of the IT Manager or in their absence, the Deputy IT Manager who will then act as the System Manager.
- 5.2 Imagery will be stored for 4 weeks, and automatically over-written unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.
- 5.3 Where such data is retained, it will be retained in accordance with the Data Protection Act, 2018 and the School's Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded in the MTS CCTV SharePoint log held in the IT Department.

6. Access to Images

- 6.1 Access to stored CCTV images will only be given to employees of Merchant Taylors' School, under the supervision of the IT Manager, in pursuance of the objectives listed above (or if there is some other overriding and lawful reason to grant such access). However, inspection of CCTV held by the School must take place only within the Technical Services Department. Direct Access to the CCTV system is limited to the IT Manager, the Deputy IT Manager and one Network Engineer. All CCTV cameras except those held in the Locker Rooms can be accessed from the network pcs allocated to these individuals. On such occasions, the Second Master, IT Manager and Deputy IT Manager are notified. Once viewing is concluded, selected footage must only be shared via hyperlinks by members of the Technical Services Department to members of the School Leadership Team.
- 6.2 In cases, where inspection of CCTV footage is required from cameras held in the Pupil Locker Rooms, express written permission must be obtained from the Designated Safeguarding Lead (or in their absence one of the Deputy Designated Safeguarding Leads). This permission must be sent to the IT Manager in advance. Access to this CCTV footage is via the central office PC which has an outward-facing monitor. CCTV footage of the Locker rooms can only occur while when either a second member of the IT team or a member of the teaching staff (who has been authorised by the Second Master or Senior Master) to investigate the footage is present. Details of all instances where CCTV is used as part of an investigation are recorded in a SharePoint log held in IT/Technical Services. When a new entry is made in the log, the Second Master, Senior Master, IT Manager and Deputy IT Manager are notified.
- 6.3 Individuals also have the right to access personal data the School holds on them (please see the School's Data Protection Policy), including information held on the System, if it has been kept. The School will require specific details including at least 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 in the imagery are identifiable.
- 6.4 The IT Manager must satisfy him/herself of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are a non-exhaustive list of examples when the IT Manager may authorise access to CCTV images:
 - 6.4.1 Where required to do so by the Head Master, the Police or some relevant statutory authority;
 - 6.4.2 To make a report regarding suspected criminal behaviour;

- 6.4.3 To enable the Designated Safeguarding Lead or one of their appointed deputies to examine behaviour which may give rise to any reasonable safeguarding concern;
 - 6.4.4 To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian will be informed as part of the School's management of a particular incident;
 - 6.4.5 To assist the School in establishing the facts in cases of unacceptable staff behaviour, or to support disciplinary investigations;
 - 6.4.6 To data subjects (or their legal representatives) pursuant to an access request under the Data Protection Act 2018 and on the basis set out in 6.2 above;
 - 6.4.7 To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
 - 6.4.8 In any other circumstances required under law or regulation.
- 6.5 Where images are disclosed under 6.3 above a record will be made in the SharePoint log including the person viewing the images, time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).
- 6.6 Where images are provided to third parties under 6.3 above, wherever practicable, steps will be taken to obscure images of non-relevant individuals.
- 7. Other CCTV systems**
- 7.1 The School does not own or manage third party CCTV systems, but may be provided by third parties with images of incidents where this is in line with the objectives of the School's own CCTV policy.
- 7.2 Many pupils travel to School on coaches provided by third party contractors and the Coach companies have been encouraged to adopt the use of removable "Go pro " style cameras. The School may use imagery from these cameras in establishing facts in cases of alleged unacceptable pupil behaviour, in which case the parents/guardian will be informed as part of the School's management of a particular incident.
- 8. Complaints and queries**
- 8.1 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 Senior Master.

Senior Master
May 2025

MERCHANT TAYLORS' CCTV FOOTAGE ACCESS REQUEST

The following information is required before the school can provide copies of, or access to, CCTV footage from which a person believes they may be identified.

Please note that it may not be possible to release CCTV footage if it contains the personal information of third parties that needs to be protected. The School typically deletes CCTV recordings after a period of four weeks from when the footage was recorded.

Name and address: (proof of ID may be required)	
Description of footage (including where necessary a description of yourself, clothing, activity etc.)	
Location of camera	
Date of footage sought	
Approximate time (give a range if necessary)	

Signature*

Print Name.....

Date

*** NB if requesting CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 or over, the child's authority or consent must be obtained except in circumstances where that would clearly be inappropriate and the lawful reasons to provide to the parent(s) outweigh the privacy considerations of the child.**