



Holy Trinity C of E Primary School CCTV Policy

The Six Principles Of Nurture

The nurturing approach offers a range of opportunities for children and young people to engage with missing early nurturing experiences, giving them the social and emotional skills to do well at school and with peers, develop their resilience and their capacity to deal more confidently with the trials and tribulations of life, for life.

1. Children's learning is understood developmentally
2. The classroom offers a safe base
3. The importance of nurture for the development of wellbeing
4. Language is a vital means of communication
5. All behaviour is communication
6. The importance of transition in children's lives

Document Control	
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Date Shared with Governing Body	July 2027
Date To Be Reviewed	at next update by DPO

This policy does not need to be approved by the governors

Introduction

CCTV is used around the school to protect our site and keep members of the school community safe from harm. Our system also helps us to prevent and detect crime and assist with apprehending offenders where necessary.

As CCTV footage includes personal data (images that can identify individuals), we will comply with the following legislation and guidance:

- The UK General Data Protection Regulation (UK-GDPR)
- Data Protection Act (2018)
- ICO Code of Practice for the use of CCTV

The schools 'Data Protection Policy' should also be reviewed alongside this policy.

Purpose

CCTV is in place at our school to meet the following purposes:

- Protect the school building and its assets.
- Ensure the health and safety of staff, pupils and other members of the school community.
- Deter and prevent (reduce) crime and anti-social behaviour.
- Detect any instances of crime and inappropriate behaviour on site.
- Support the police and other bodies (insurance etc) to identify, apprehend and prosecute offenders.
- To support the school in any legal claims we are party to.
- Ensuring school policies and rules are respected by all parties.

Scope

The CCTV system consists of fixed cameras placed at strategic locations internally and externally across our school site. The system runs on a 24/7 basis for 365 days of the year. For the most part, cameras record images only; however, cameras in the school reception area record sound to support the health and safety of our staff and pupils.

The system is operated and controlled by the school and managed internally by the Facilities Manager.

The school is registered with the Information Commissioners Office (ICO) and pays an annual fee.

Responsibilities

The Governing Body will have overall responsibility for the CCTV provision and ensure that adequate resources are available to manage and maintain the system.

The Headteacher will be responsible for ensuring that this policy is implemented effectively and make key decisions on its use.

The Facilities Manager will:

- Perform a daily maintenance check on the system to ensure that the cameras and recordings are operational.
- Respond to any system alerts in or outside school hours.
- Support the school with downloading incident data to fulfil requests for footage.
- Support the DPO with assessing privacy risks relating to the system.
- Ensure that adequate signage is in place to inform individuals that CCTV is operational.
- Ensure that specialist system support is in place via a third-party contractor to maintain the system and fix any issues promptly.
- Procure compliant signage to install across the school site.
- Ensure that staff with access are effectively trained on the system and its use.
- Oversee requests for information with support of the Data Protection Officer (DPO).

The DPO will oversee compliance with data protection law and ensure that privacy risks are explored and addressed accordingly.

All staff are responsible for complying with this policy. Non-compliance of this policy may result in disciplinary action.

General Statement

Access to the CCTV system is strictly limited to a small number of staff. The school ask that authorised staff agree to:

- Comply with the 'CCTV Policy' and the school 'Data Protection Policy' when accessing and handling footage containing personal data.
- Use the system in a manner that is consistent with all applicable existing policies and procedures adopted by the school.
- Use the system in a professional, ethical and legal manner and for the purpose outlined in this policy only.
- Seek approval from the Headteacher if they wish to use the system for a new purpose.
- Not disclose or share CCTV footage with any individual or organisation without approval from the Headteacher.
- Report any system issues to the Facilities Manager without undue delay.

Justification on System Use

The use of the CCTV system for the aforementioned purposes has been approved by the Headteacher and Governing Body. The system will not be used to monitor 'routine' (normal) staff or pupil activity in school.

In areas where the CCTV has been installed, the school has determined that there is a genuine risk to site security or the health and safety of the individuals that we are responsible for and that the use of CCTV will support in reducing this risk.

Privacy

The school will only position cameras in areas where they will capture footage relevant to the intended purpose(s). Care must be taken to ensure that individuals privacy expectations are not violated; the school will conduct a 'Data Protection Impact Assessment' (DPIA) prior to installation or changes to the system to assess the privacy implications of the cameras location and use.

The school will make every effort to ensure that external camera footage is restricted to the school site as much as possible to limit images of the general public. Monitoring and recording of public areas may take place for the following reasons:

- Protection of the school site
- Health and safety
- Monitoring access and egress to the school site including car park and traffic control
- Criminal investigations carried out by the Police

Internally, CCTV will not be installed in areas where there is an expectation of privacy including, but not limited to:

- Bathroom areas
- Classrooms
- Meeting rooms
- Inside of offices

Sound recording features will be switched off unless voice recordings support one of the core purposes of the CCTV system. The two cameras which will have the audio recordings switched on are in main reception.

The school will not monitor conversations unless we are made aware of an incident, such as verbal abuse that requires an investigation. In such cases, the school will pinpoint the date and time to limit the data that we need to access.

The school will inform staff working in the vicinity of cameras that record sound of their presence and provide reassurance that the recording is for their safety and not to monitor their work or conversations.

The school will not engage in covert surveillance of any kind.

Any third-party contractors employed to maintain the system will not be provided with access to footage unless it is required to perform a fix on the system. In such instances, the Site Manager will remain present whilst the fix is conducted. The school will only employ third party contractors if they can demonstrate compliance with data protection law.

The Right to be Informed

Under the UK-GDPR, the school must clearly inform people how their personal data will be processed and why. The school will do this by:

- Making a copy of this policy available to all individuals whose personal data may be captured on the school CCTV system.
- Include the use of CCTV in our privacy information.
- Ensure that adequate and compliant signage is placed in areas where CCTV is installed.

CCTV signage at key entrances to the school site and around the perimeter must include:

- That CCTV is in place and recording (images & sound where applicable)
- The main purpose of the system; security and prevention and detection of crime etc
- The name of the organisation that controls the system; the school
- Contact details should individuals have a question or wish to find out more

Smaller signs inside school will serve as a reminder that CCTV is in operation.

The school office is on hand for individuals to contact and raise any concerns regarding the use of CCTV.

Accessing Footage

Access to footage will be strictly limited to a small number of senior staff members; the server is stored in a restricted area that is locked when not in use. The system is only accessible by approved personnel only and password protection is in place on both the server and devices used to access the system. The system keeps a log of when staff access the system and / or stored images.

CCTV footage may only be accessed by approved staff members in the following scenarios:

- The Police request footage to investigate a suspected crime reported by the school or third party.
- The court request access to footage as part of a court order.
- The school insurance provider requires access to footage to enact or defend a claim.
- To assist the Headteacher or Governing Body in investigations into unacceptable staff, pupil or visitor behaviour.
- To assist the school if there is an urgent need to protect or save the life of an individual.
- To assist the Local Authority and other statutory bodies in investigating incidents and inappropriate behaviour.
- An individual, or their parent in respect of younger pupils makes a 'subject access request' for footage.

Requests for access from third parties will be reviewed on a case-by-case basis with support from the schools Data Protection Officer (DPO).

Requests for Access

The Headteacher and / or DPO must be informed without undue delay if a request for access to CCTV footage is made. Footage must not be disclosed without approval from the Headteacher.

Requests from the following parties must be made in writing:

- Police (signature of rank investigating officer required)
- Insurance
- Courts
- Statutory Bodies

It is preferred that individuals (or their parents in respect of younger children) also make requests in writing.

The school reserve the right to verify the identity and legitimacy of any requester, if we are uncertain of their identity or right to act on behalf of or investigate the Data Subject.

Requests must include a date, time frame and location to support the school in searching the footage; we ask that requests are as specific as possible.

The school will not release footage if disclosure would:

- Jeopardise or prejudice an ongoing investigation or legal claim.
- Risk the health & wellbeing of an individual or third party.
- Reveal the identity of other third parties.

Third Party Data

More often than not, CCTV footage will include individuals other than the requester (or their child). Under data protection law, individuals can only make requests to access their own data and not that of any third parties. Requests for footage that contain other individuals will be refused unless:

- The third parties have provided their consent to share their data as part of the request; any consent must be written and logged.
- It is possible to omit / redact the identities of third parties.

Please note: the school CCTV system does not have the capabilities to blur out the identities of third parties in video footage. As an alternative, the school may offer (where appropriate) a written account of their personal data contained in the footage or a set of still images if it is possible to fully redact the identities of third parties.

Details of all requests must be logged in the schools information request register.

Disclosure of Footage

The school will respond to all requests within one calendar month; in cases where we cannot provide the requested footage, a full explanation will be given. The school reserves the right to extend more complex requests by a further two calendar months; we will however inform the requester within the first month of any intention to extend and the reasons why.

If the school deem it appropriate to share video footage as part of a request, the requester will be offered an opportunity to come into school and view the footage. This avoids the need to create a disc / USB copy which may be prone to loss, theft or damage.

If a copy is required, the school must ensure that the file is password protected and sent via a secure method with proof of receipt. It is preferable to send a copy via secure email rather than a physical copy. If a physical copy is the only option, this should be collected and signed for in person where practical. The copy will be kept in a locked cabinet whilst awaiting collection. Tracking and signed proof of delivery will be in place if copies must be sent via post.

Retention of Footage

As standard, CCTV recordings are kept for a period of 30days before being automatically overwritten. A short retention period was chosen as it is anticipated that any incidents would be brought to the schools attention quite quickly.

If an incident is captured, the school will extract a copy of the incident to ensure it is not automatically deleted. The school will review the progress of any investigations and securely dispose of the copy once it is no longer needed.

Complaints

Any concerns of issues regarding our CCTV system should be made to the school office in the first instance to give us the opportunity to resolve the complaint.

Monitoring

This policy will be reviewed on an annual basis or sooner should a significant change in legislation or data processing occur.