OUGHTON PRIMARY AND NURSERY SCHOOL

CCTV Policy

Policy Approval Date: September 2026

Approved by the Full Governing Body see minutes dated September 2026

Review Date: Autumn 2028

HFL Education HR Services GDPR Toolkit: Date of Issue: **March 2023**

This policy follows the HFL Education model CCTV Policy.

HR Services, GDPR Toolkit, HFL Education.

1. Policy statement and objectives

1.1 The School has in place a CCTV surveillance system on its site. The purpose of this policy is to set out the responsibilities of the School regarding the management, operation and use of the CCTV system, and details the procedures to be followed in order to ensure that the School complies with relevant legislation.

1.2 This policy applies to all members of our staff, visitors to the site and all other persons whose images may be captured by the CCTV system.

1.3 This policy takes account of all applicable legislation and guidance, including:

1.3.1 UK General Data Protection Regulation ("UK GDPR")
1.3.2 Data Protection Act 2018
1.3.3 CCTV Code of Practice produced by the Information Commissioner's Office (ICO)
1.3.4 Human Rights Act 1998
1.3.5 Freedom of Information Act 2000

2. Purpose of the CCTV system

2.1 The principal purposes of the CCTV system are as follows:

2.1.1 to ensure the safety of staff, students and visitors;
2.1.2 for the prevention, reduction, detection and investigation of crime and other incidents;
2.1.3 to assist in the investigation of suspected breaches of School rules

2.2 The School intends to use CCTV for the purposes of:

2.2.1 providing a safe and secure environment for pupils/students, staff and visitors;
2.2.2 protecting the School buildings and assets, both during and after hours;
2.2.3 reducing the incidence of vandalism, bullying, anti-social behaviour and site incursion;
2.2.4 enabling a faster and more effective resolution to incidents by assisting staff in identifying persons who have committed a breach of the School rules;
2.2.5 safeguarding pupils/students absent from lessons through visible checks about location during the school day and also during lunch;
2.2.6 assisting in the prevention of crime and assisting law enforcement agencies in apprehending offenders

2.1 The use of the CCTV system will be conducted in a professional, ethical and legal manner and only for the intended purposes. The above list is not exhaustive, and other purposes may become considered as relevant.

2.2

3. Overview of the CCTV System

3.1 The CCTV system is owned and managed by the School. Under current data protection legislation the School is the 'data controller' of the images produced by the CCTV system. Recognisable images captured by CCTV systems are 'personal data'.

3.2 The CCTV system operates to meet the requirements of the current data protection legislation and the ICO's guidance.

3.3 The CCTV system produces clear images which are suitable for the intended purposes, and which can easily be taken from the system when required. Audio will not be recorded unless we have strong jurisdictions for doing so which have been assessed and documented in our CCTV risk assessment.

3.4 The system comprises of 23 fixed cameras. The School has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.

3.5 Cameras are sited to ensure that they only capture images relevant to the purposes for which they are installed.

3.6 Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property. Care will be taken to ensure that reasonable privacy expectations are not violated.

3.7 CCTV will not be used in classrooms and the IT suite.

3.8 CCTV systems will not be used to monitor normal teacher/student classroom activity in school.

3.9 CCTV warning signs will be clearly and prominently placed at all external entrances to the site. Adequate signage will be placed at each location in which a CCTV camera is sited to indicate that CCTV is in operation. Signs will contain details of the purpose for using CCTV.

4. Monitoring and Recording

4.1 CCTV monitors the exterior of our premises 24 hours a day and this data is continuously recorded.

4.2 The viewing of live CCTV images and recorded images which are stored by the CCTV system will be restricted to authorised staff with the required security access. This may include authorised Early Days and Family Centre employees. The images can be viewed on the monitor in the Headteacher's office.

4.3 All authorised operators and staff with access to images are aware of the procedures that need to be followed when accessing the recorded images. All staff are aware of the restrictions in relation to access to, and disclosure of, recorded images.

4.4 Relevant images may be shared with governing body panels reviewing exclusions, disciplinary matters or complaints.

4.5 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to the disclosure of images.

4.6 Staff using surveillance systems will be given appropriate training to ensure they understand and observe the legal requirements related to the processing of relevant data.

4.7 Monitoring and recording of Public Areas may include the following:

4.7.1 the building's perimeter, main entrance/exit gates, lobbies and storage areas;
4.7.2 restricted access areas at entrances to buildings and other areas;
4.7.3 door controls, external alarms;
4.7.4 parking areas, adjacent public highway

5. Storage and Retention of Images

5.1 The images captured by the CCTV system will be retained for a maximum of 21 days from the date of recording, except where the image identifies an issue and is required to be retained specifically in the context of an investigation/prosecution of that issue.

5.2 The images/recordings will be stored in a secure environment with a log of access kept then destroyed when no longer in use.

5.3 Access will be restricted to authorised personnel only.

6. Viewing and/or Disclosure of Images

6.1 Where images/recordings are required to be viewed by a member of staff in order to investigate a serious incident, authorisation is required from Lisa Clayton, Caroline Phillipson, Helen Channa or Mary Banton.

6.2 Requests by individual data subjects for images relating to themselves will be treated as a 'Subject Access Request' and should be submitted in writing to the Data Protection Officer (DPO) together with proof of identification. Further details of this process can be found in the Data Protection Policy.

6.3 In order to locate the images, sufficient detail must be provided by the data subject in order to allow the relevant images to be located.

6.4 Where the School is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

6.5 The School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation. In some circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation. Relevant images may also be shared with governing body panels reviewing exclusions, disciplinary matters or complaints.

6.6 All such disclosures will be made at the discretion of the DPO.

6.7 A record of any disclosure made under this policy will be held on the CCTV management system, detailing the date, time, camera, requestor, authoriser and reason for the disclosure.

7. Data Protection Impact Assessment

7.1 Prior to the installation or repositioning of any CCTV camera, or system, a data protection impact assessment (DPIA) is required to be conducted by the School to ensure that the proposed installation is compliant with legislation and ICO guidance. The assessment will be approved by the DPO.

7.2 The School will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

8. Complaints Procedures

8.1 Complaints concerning the School's use of its CCTV system or the disclosure of CCTV images should be made in writing to the Headteacher.

9. Policy and CCTV System Review

9.1 This policy is reviewed annually with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.

9.2 The School carries out an internal assessment annually to evaluate the usage and effectiveness of the CCTV system.