



CCTV POLICY

APPROVED BY: Governing Body

NEXT REVIEW: September 2025

1 Introduction

1.1 Holmleigh Primary School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.

1.2 CCTV surveillance at the School is intended for the purposes of:

- protecting pupils, staff and visitors against harm to their persona and/or property
- increasing a sense of personal safety
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- protecting the school buildings and school assets, both during and after school hours;
- supporting the Police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and
- ensuring that the school rules are respected so that the school can be properly managed.

1.3 The system comprises 15 fixed cameras around the school site (13 external and 2 internal)

1.4 The system has sound recording capability on some of the cameras.

1.5 The CCTV system is owned and operated by the school and the deployment of which is determined by the school's Headteacher. The CCTV is a standalone system and operated by the school.

1.6 The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

1.7 The CCTV is monitored centrally from the school offices by the Operating Manager, (Headteacher) and Premises Manager.

1.8 The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and the school community.

1.9 The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.

1.10 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are trained by the school data controller in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

2 Statement of Intent

2.1 The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:

<https://www.gov.uk/government/publications/update-to-surveillance-camera-code/amended-surveillance-camera-code-of-practice-accessible-version>

2.2 CCTV warning signs are clearly and prominently placed at all external entrances to the school.

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

3 Siting the Cameras

3.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

3.3 CCTV will not be used in classrooms but in areas within school that have been identified by staff and pupils as not being easily monitored.

3.4 Members of staff have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

4 Covert Monitoring

4.1 The school may in exceptional circumstances set up covert monitoring. For example:

i) Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct; ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

4.2 In these circumstances authorisation must be obtained from a member of the senior leadership team.

4.3 Covert monitoring must cease following completion of an investigation.

4.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles.

5 Storage and Retention of CCTV images

5.1 Recorded data will be overwritten by fresh data by default after 28 days. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

5.2 All retained data will be stored securely.

6 Access to CCTV images

6.1 Access to the CCTV system and data is password protected.

6.2 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

7 Subject Access Requests (SAR)

7.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

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

7.3 The school will respond to requests within 40 calendar days of receiving the written request and fee.

7.4 The school 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.

8 Access to and Disclosure of Images to Third Parties

8.1 In relevant circumstances, CCTV footage may be accessed:

- By the police where Holmleigh Primary School is required by law to make a report regarding the commission of a suspected crime; or
- Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on The school's property, or
- To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the Headteacher in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- To data subjects (or their legal representatives), pursuant to a Subject Access Request or
- To individuals (or their legal representatives) subject to a court order.
- To the school insurance company where footage is needed to pursue a claim for damage done to the insured property.

8.2 Requests should be made in writing to the Headteacher.

8.3 The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

9. Staff Training

9.1 Staff authorised to access the CCTV system will be trained to comply with this policy. Staff will understand that all information relating to the CCTV images must be handled securely.

9.2 Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.

10 Complaints

10.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.