



# **CCTV POLICY**

**Inspire, Empower, Improve**

Date of Policy	February 2026
Headteacher	D Spong
Chair of Governors	D Dykins
Review date	February 2028
Approved by	Resources Committee

'Learning well today to live a better tomorrow'

## Contents

1. Aims
  2. Relevant legislation and guidance
  3. Definitions
  4. Covert surveillance
  5. Location of the cameras
  6. Roles and responsibilities
  7. Operation of the CCTV system
  8. Storage of CCTV footage
  9. Access to CCTV footage
  10. Data Protection Impact Assessment (DPIA)
  11. Security
  12. Complaints
  13. Monitoring
  14. Links to other policies
- 

### 1. Aims

This policy sets out the School's approach to the operation, management, and use of surveillance and closed-circuit television (CCTV) systems on School property.

This policy relates directly to the location and use of CCTV, and the monitoring, recording, and subsequent use of recorded material. The School complies with Information Commissioner's Office (ICO) CCTV guidance to ensure that CCTV is used responsibly and safeguards trust and confidence in its use.

CCTV warning signs will be clearly and prominently displayed at the School's main external entrances.

The planning and design of the system have endeavoured to ensure maximum effectiveness and efficiency; however, it cannot be guaranteed that the system will cover or detect every incident occurring within the areas of coverage.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the School, including the Equality & Diversity Policy, Codes of Practice for dealing with complaints of bullying, harassment and sexual harassment, and other relevant policies, as well as the provisions set out in equality and related educational legislation.

This policy prohibits monitoring based on the protected characteristics contained in equality and related legislation, for example, race, gender, sexual orientation, national origin, or disability.

Video monitoring of public areas within the School premises is limited to uses that do not violate an individual's reasonable expectation of privacy.

Recognisable images captured by CCTV systems are classed as *personal data* and are therefore subject to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

---

## 1.1 Statement of intent

The purpose of the CCTV system is to:

- Make members of the school community feel safe
- Protect members of the school community from harm to themselves or their property
- Deter criminal activity within the School
- Protect School assets and buildings
- Assist the police in deterring and detecting crime
- Determine the cause of accidents
- Promote the health and safety of staff, pupils, and visitors
- Safeguard children
- Assist in the effective resolution of disputes arising from disciplinary or grievance procedures
- Assist in the defence of any litigation proceedings

The CCTV system **will not** be used to:

- Encroach upon an individual's right to privacy
- Monitor people in areas where there is a heightened expectation of privacy (including toilets and changing rooms)
- Follow particular individuals unless there is an ongoing emergency incident
- Be used for purposes other than those stated above

The list of uses is not exhaustive, and additional legitimate purposes may arise in future.

The CCTV system is registered with the Information Commissioner under the Data Protection Act 2018 and complies with the UK GDPR.

Footage obtained via the CCTV system will never be used for commercial purposes.

In the unlikely event that the police request CCTV footage for release to the media, this will only be complied with where written authorisation has been provided by the police and solely to assist in the investigation of a specific crime.

Footage generated by the system should be of sufficient quality to assist the police or courts in identifying individuals where necessary.

---

## 2. Relevant legislation and guidance

### 2.1 Legislation

- UK General Data Protection Regulation
- Data Protection Act 2018
- Human Rights Act 1998
- European Convention on Human Rights
- Regulation of Investigatory Powers Act 2000
- Protection of Freedoms Act 2012
- Education (Pupil Information) (England) Regulations 2005 (as amended)
- Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- School Standards and Framework Act 1998
- Children Act 1989
- Children Act 2004
- Equality Act 2010

### 2.2 Guidance

- Surveillance Camera Code of Practice (2021)
- 

## 3. Definitions

- **Surveillance:** The act of monitoring a person or place
  - **CCTV:** Closed-circuit television; video cameras used for surveillance
  - **Covert monitoring:** Operation of cameras where individuals are not made aware they are under surveillance
- 

## 4. Covert surveillance

The School retains the right, in exceptional circumstances, to carry out covert surveillance. For example:

- Where there is good cause to suspect that illegal or serious unauthorised activities are taking place; or
- Where notifying individuals of the surveillance would seriously prejudice the purpose of the monitoring.

In such circumstances, authorisation must be obtained in advance from both the Headteacher and the Chair of Governors.

Covert surveillance will cease once the relevant investigation has concluded.

Cameras used for covert surveillance will never be placed in areas where privacy is reasonably expected, such as toilets or changing facilities.

---

## **5. Location of the cameras**

Cameras are installed in locations necessary to achieve the aims of the CCTV system outlined in section 1.1.

The cameras are positioned to capture only images relevant to their intended purpose, and every effort is made to ensure that individuals' reasonable expectations of privacy are not breached. The School ensures camera locations comply with relevant legislation.

Wherever possible, cameras are positioned so coverage is restricted to School premises only, including indoor and outdoor areas.

Staff may access details of camera locations, except those installed for covert surveillance.

CCTV monitoring of public areas may include:

- Protection of School buildings and property (entrances, exits, corridors, storage areas)
  - Monitoring access control systems
  - Verification of security alarms
  - Monitoring parking areas and vehicle movement
  - Supporting police investigations
- 

## **6. Roles and responsibilities**

### **6.1 Governing Board**

The Governing Board holds ultimate responsibility for ensuring the CCTV system operates in line with this policy and relevant legislation.

## **6.2 Headteacher**

The Headteacher will:

- Oversee day-to-day operation of the CCTV system
- Ensure staff compliance with this policy
- Review the policy to ensure legislative compliance
- Ensure authorised users receive appropriate training
- Approve system expansion following DPIA advice
- Decide on third-party disclosure in consultation with the DPO

## **6.3 School Business Manager (SBM)**

The SBM will:

- Liaise with the Data Protection Officer (DPO)
- Process subject access requests (SARs)
- Monitor data protection compliance
- Ensure data retention schedules are followed
- Maintain accurate records of processing activities

## **6.4 System Manager (Network Manager)**

Responsible for:

- System maintenance and security
  - Termly system checks
  - Ensuring time/date accuracy
  - Training authorised users
  - Ensuring footage quality and retention compliance
- 

## **7. Operation of the CCTV system**

The CCTV system operates 24 hours a day, 365 days a year.

Audio recording is not enabled.

All footage includes date and time stamps, checked termly and when clocks change.

---

## **8. Storage of CCTV footage**

Footage is retained for 30 days and then automatically overwritten unless required for investigation or legal purposes.

All footage is stored securely on a central server.

---

## **9. Access to CCTV footage**

Access is restricted to authorised staff only and strictly on a need-to-know basis.

Footage will only be disclosed to third parties such as police or investigators where appropriate and lawful.

Non

---

### **9.1 Staff access**

Authorised staff:

- Senior Leadership Team
- Network Manager
- Those with Headteacher approval

Misuse may result in disciplinary action and/or criminal proceedings.

---

### **9.2 Subject Access Requests (SARs)**

Individuals may request footage of themselves in writing to the Headteacher.

Requests may be refused where disclosure would prejudice an ongoing investigation.

Identifying images of other individuals will be redacted where possible.

A reasonable fee may be charged for excessive or unfounded requests.

---

### **9.3 Third-party disclosure**

Requests must be made in writing to the Headteacher.

Disclosures will comply fully with the UK GDPR and be recorded.

---

## **10. Data Protection Impact Assessment (DPIA)**

A DPIA will be undertaken whenever CCTV systems are installed, moved, or significantly altered.

---

## **11. Security**

The system manager ensures system security, encryption where possible, password protection, timely software updates, and cyber security measures.

---

## **12. Complaints**

Complaints should be made to the Headteacher in accordance with the School's complaints policy.

---

## **14. Links to other policies**

- Data Protection Policy
- Freedom of Information Policy
- Information Sharing Policy
- Information Security Policy
- Acceptable Use Policy
- Safeguarding Policy
- Privacy Notices
- Subject Access Request

Further guidance is available from the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk)

---