CCTV Policy

Last reviewed	**May 2026**
Reviewed by	**Catherine Phillips**
Approved by	**Governing Board**
Date of approval	**May 2026**

This policy is adopted from an SCC template policy

To be reviewed every two years

Contents:

1. Purpose

The Purpose of this policy is to regulate the management, operation and use of the Closed Circuit Television (CCTV) system at St Leonard's Primary School.

CCTV surveillance at the School has been installed in pursuit of a legitimate aim and is necessary to meet an identified pressing need. It is intended for the following purposes,:

- protecting the School buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, pupils and visitors;
- preventing bullying;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the police in a bid to deter and detect crime;
- ensuring that the School rules are respected.

The system does not have sound recording capability.

The CCTV system is owned and operated by the School, the data controller, the deployment of which is determined by the School's leadership team. Any significant changes to existing CCTV system(s) will be subject to consultation with staff and Governors and will only be undertaken upon completion and approval of a Data Protection Impact Assessment following the principles of data protection by design.

The School's CCTV is registered with the Information Commissioner's Office (ICO).

2. Scope

This policy relates directly to the use of CCTV and the monitoring, recording and subsequent use of such recorded material, having due regard where necessary to legislation, statutory and non-statutory guidance including, but not limited to the following.

- Surveillance Camera Commissioner '12 Guiding Principles'
- Data Protection Act 2018 (DPA)
- General Data Protection Regulation (GDPR)
- Protection of Freedoms Act 2012 (PoFA)
- Home Office 'Surveillance Camera Code of Practice'
- Information Commissioner's Office (ICO) 'CCTV Code of Practice'

The school will also consider their obligations in respect of the wider regulatory environment, including, but not limited to the following.

- Regulation of Investigatory Powers Act 2000 (RIPA)
- Freedom of Information Act 2000 (FOIA)
- Human Rights Act 1998 (HRA)

CCTV warning signs are clearly and prominently placed at the main external entrance to the School as well as in individual areas where CCTV is used. Prominent signs will be placed within the controlled areas and must contain details as set out in the example at **Appendix A**.

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

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

Cameras are sited so that they only capture images relevant to the purposes for which they have been installed, as detailed in item 1. above and due care will be taken to ensure that reasonable privacy expectations are not violated.

Recognisable images captured by CCTV systems are 'personal data' and are subject to the provisions of the General Data Protection Regulation and Data Protection Act 2018, they are therefore subject to GDPR Article 5 Principles:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and up to date
- Kept for no longer than is necessary
- Processed in a manner that ensures appropriate security

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the School or a student attending the School.

3. Accessing Systems

Access to the surveillance system, its associated equipment and any live or recorded images will be strictly limited to operators who are authorised to do so on a need-to-know basis and for the purposes of their job role.

All operators are made fully aware of the procedures that need to be followed when accessing live and recorded images and are made aware of their responsibilities in following the CCTV Code of Practice.

All operators are aware of the restrictions in relation to access to, and disclosure of, live and recorded images.

Records of operators and reasons for access must be maintained.

4. Storage and Retention

Recorded data will not be retained for longer that 30 days, after which time captured images are automatically and permanently deleted.

Where images are processed in the context of an investigation pursuant to any of the purposes in section 1. above, they shall be retained in a secure manner for the duration of that investigation and will only be accessed by those authorised to do so for the purposes of that investigation, after which time they will be permanently deleted.

5. Sharing

Recorded images may be released to third parties in the following limited and prescribed circumstances and to the extent required or permitted by law

- The police – where the images recorded would assist in a specific criminal inquiry and where a Police Request (**Appendix B**) has been completed
- Prosecution agencies – such as the Crown Prosecution Service (CPS)
- Relevant legal representatives – such as lawyers and barristers where a court request exists
- Persons who have been recorded and whose images have been retained where disclosure is required by virtue of data protection legislation and any other associated legislation or regulation.

It is important that access to, and disclosure of images is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact, should the images be required for evidential purposes.

Individuals have the right to access data or information relating to themselves. The School may request that individuals provide sufficient information to enable footage relating to them to be identified, such as date, time and location (**Appendix C**).

The School must have due regard for third party information, when disclosing images of individuals, particularly when responding to Subject Access Requests (SARs). Consideration must be made for the identifying features of any of the other individuals in the image and whether they need to be obscured.

In compliance with GDPR Article 15, a SAR will be responded to in accordance with the School's Data Protection Policy and Freedom of Information and Subject Access Request Policy.

All requests for access or disclosure must be reviewed by the Headteacher, or nominated person responsible. Requests, decisions, justifications and outcomes should be recorded and retained in line with the School's retention schedules.

6. Roles and Responsibilities

The Governing Board and Headteacher at St Leonard's, in its capacity as a public body and data controller, are responsible for ensuring that policies, guidance and records, including security and access arrangements, are appropriately maintained and communicated in accordance with the GDPR Principles as defined in item 2. above.

All operators of the surveillance system, its associated equipment and anyone processing live or recorded images, must adhere to this Policy and any accompanying guidance.

Records of operators and reasons for access should be maintained.

7. Policy Review

The School is responsible for implementing an appropriate review schedule and should include the possibility of interim reviews to account for changes to legislation, national guidance, codes of practice or commissioner advice.

Appendix A
CCTV SIGNAGE

It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded.

The School is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded.
- The purposes of using CCTV.
- The name of the School.
- The contact telephone number or address for enquiries.

Example Sign

WARNING CCTV cameras in operation **Images are being monitored and recorded for the purpose of** **Crime prevention, the prevention of anti-social behaviour, the prevention of bullying, for the safety of our staff and students and for the protection of the School and its property.** **This system will be in operation 24 hours a day, every day.** **These images may be passed to the police.** **This scheme is controlled by the School** **For more information contact ……**

Appendix B

Police Request

Personal Data Request DPA Sch2(2) Form
Data Protection Act 2018

Requestor Details

First name(s):		**Last name:**	
Job title:			
Organisation:			
Address:			
Postcode:		**Telephone:**	
Email:			

Data Subject Details

Current details

First name(s):		**Last name:**	
Address:			

Other identifying information

Specific information required

Reason for requesting disclosure

Offence(s)

- ☐ Unable to specify offence due to risk of prejudicing the case

Statutory powers (eg Sexual Offences Act, Prevention of Crime Act etc)

Purpose

State the purpose for requesting disclosure of personal information about the data subject specified in section 2 of this form.

Select one option

- ☐ Prevention or detection of crime
- ☐ Apprehension or prosecution of offenders
- ☐ Assessment or collection of tax, duty or imposition of a similar nature

Information provision

Unless there is a reasonable justification, all information will be provided in electronic format.

We will notify you if we do not hold information or your request for disclosure is refused

Declaration and authorisation

The authorising officer **must be of the rank of police inspector or higher**, or for other 'relevant bodies' a senior officer/manger. In the case of an inspector not being available at your location, we will accept an email from an inspector (or higher ranking officer) attaching this paperwork and confirming their approval. **We do not accept typed signatures**.

Declaration

I certify that:

- Information requested is compatible with the stated purpose and will not be used in anyway incompatible with that purpose
- Non-disclosure would prejudice the case
- I understand information given on this form is correct
- I understand that if any information given on this form is incorrect, I may be committing an offence under the Data Protection Act 2018

Requestor

Signed:		**Date:**	

Authorising Officer

First name:		**Last name:**	
Job title:			
Signed:		**Date:**	

Where to send your request

Please note:
If the form has not been fully or properly completed and authorised you will be asked to re-submit your application.

Send this form to:

Email:	Office@st-leonards-stafford.staffs.sch.uk
Postal address:	St Leonard's Primary School Fairway Stafford ST16 3TW

Appendix C

Subject Request Form

CCTV DISCLOSURE REQUEST FORM

	The information that you supply via this form will be entered into a filing system and will only be accessed by authorised personnel. The information will be retained only for the purpose of processing your Disclosure Request and for audit purposes. By supplying such information you consent to the storing of this information for the stated purposes. The information is held in accordance with the provisions of the Data Protection Legislation.

DATA SUBJECT DETAILS

1: Please provide the following information to confirm your identity	
Your full name	
Any previous surname by which you were or are known to the school	
Your date of birth	
Your current postal address	
Your current telephone and/or mobile number	
Your current e-mail address	

2: Please provide a photograph to aid identification:

LOCATION

3: To help us locate the relevant personal information, please specify in the following box details of the relevant camera location, the date and time of the image/s that you wish to see as well as a general description of your appearance, clothing etc. at the time the image was recorded.

DATE	TIME (APPROX.)	AREA/CAMERA LOCATION	DESCRIPTION OF APPEARANCE

DECLARATION STATEMENT

4: To be completed by all applicants.
I certify that the information given on this form is true and accurate to the best of my knowledge. I understand that it may be necessary to confirm my/the Data Subject's identity. I also understand that it may be necessary to obtain more detailed information in order to complete the request and that the 1 month period in which to respond to my request, only commences when reasonable inquiries to confirm my identity are completed. I hereby request a search for the records in the area identified above, confirmation as to whether it holds any of my personal data (images) and to supply me with a copy of those images. Sign _____ Date _____ Print Name _____
Documents that must accompany this application: 1. Evidence of your Identity - you must supply evidence of your identity such as a photocopy of the identity page of your passport or driving licence. 2. All Disclosure Requests are free of charge, however we reserve the right to charge a 'reasonable fee' if a request is manifestly unfounded or excessive, particularly if it's repetitive. The fee will be based on the administrative cost of providing the information.
When you have completed this form please return it, with the accompanying documents to the Responsible Officer for the system from which your request is being made. **Each RO should add a suitable email and postal address here**

Office use only

Date request received		
Has the Identity been checked?	YES	NO

Type of document used to establish ID e.g. student card, driver's licence	

Date receipt and/or acknowledgement sent	

Was any data withheld?	YES	NO

Reason for withholding data: _____

Was the subject informed of the reasons for withholding data?	YES	NO

Format of personal data sent	Email ¨ Letter ¨ By Other (please specify) _____ _____

Notes and Actions

_____
_____
_____

Compliance Date

Date of 1 month start _____	end _____

Date passed to data subject:	
Signed:	
Position:	