Policy for:

GDPR:

CCTV Policy

Approval: Headteacher Review

Document Control

A. Confidentiality Notice

This policy document has been approved by the Headteacher of St.Modwen's Catholic Primary School and is intended for internal and /or external publication. Where the document is identified for internal use the policy information may not be shared with external agencies or parents without the prior agreement of the Headteacher or authorising Committee.

B. Document Details

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Scheduled Review:	November 2026 (1 Year)

C. Document Revision and Approval History

Version	Date	Version Created by	Version Approved by	Comments
25.26 V3	18.11.2024	C Salt (SBM)	Headteacher: Operational	School Policy. 25/26 Amends: Adopted PHP Law Model Policy published reviewed 26.8.2025
24.25 V2	18.11.2024	C Salt (SBM)	Headteacher: Operational	School Policy. 24/25 Amends: Adopted John Walker Model Policy published October 2023
V1	7.11.2023	School	PH & S	Revised August 2023 – John Walker Policy 10.5.2023 complete re-write of whole policy by John Walker

CCTV policy

School uses closed-circuit television (CCTV) in order to protect the safety of students, staff, parents/carers and visitors.

This policy outlines how the School uses CCTV in line with the principles set out within the Surveillance Camera Code of Practice 2021. All personal data obtained is stored in accordance with UK General Data Protection Regulations (UKGDPR) and Data Protection Act 2018.

Purpose

The CCTV recordings may be used for:

- prevention and detection of crimes, in the School and on the premises
- student behaviour management, discipline and exclusions
- staff disciplinary and associated processes and appeals
- maintaining a safe environment for the whole School community

Processing may also be carried out under the recognised legitimate interest basis introduced by Data (Use and Access) Act 2025 specific to supporting safeguarding, crime prevention and public safety.

CCTV system operation

The CCTV system will be operational 24 hours a day, 365 days a year.

The Data Controller is registered with the Information Commissioner's Office.

The system does not record audio.

All recordings will have date and time stamps.

Location of cameras

The cameras are located in places that require monitoring in order to achieve the purpose of the CCTV system.

Appropriate signs are displayed around the School premises within prominent locations that clearly identifies that CCTV recording is in operation.

Signs are located at the entrance gate, building entrance and inside reception. Signs are located at the entrance gate, the building entrance and inside reception.

General access to CCTV footage

It will not be common practice to release CCTV footage unless satisfactory evidence for ~~legal proceedings~~ a secure legal basis can be provided. This is authorised within Section 115, Crime and Disorder Act 1998.

In appropriate circumstances, the School may allow authorised personnel to view footage where the above purposes are considered.

The School will maintain a record of all disclosures.

All requests for access should made in writing to the system manager Mrs A Sherratt, Headteacher and be specific to a date and time frame.

Any disclosure will be done in line with UK GDPR and Data Protection.

The School cannot guarantee disclosure of footage when made under a Subject Access Request due to:

- lack of technical resources available in order to blur or redact the footage
- the release of footage would prejudice an ongoing investigation
- other identifiable individuals have not consented

Authorised CCTV system operators

The School has limited staff members, who are fully trained and understand the importance of confidentiality, authorised to access and operate the CCTV system. The authorised personnel within School are:

- Mrs A Sherratt , Headteacher – system manager
- Mrs C Salt, School Business Manager
- Mrs L Roberts, Office Manager
- Mr N Hubbard, site/caretaker

Storage of footage

Footage will be retained for no longer than necessary to achieve the purposes of the system.

The retention period will be 30 days. At the end of the retention period, the files will be 30 days. On occasion footage may be retained for longer than 30 days. For example, where a law enforcement body is investigating a crime.

Recordings will be downloaded and encrypted, so that the data will be secure, and its integrity maintained, to ensure it can be used as evidence if required.

All recordings must be logged and traceable throughout their life within the system.

CCTV system security

A full Data Privacy Impact Assessment will be completed upon deployment, replacements, development or upgrading of the CCTV system. This is in line with the UK GDPR principle, Privacy by Design, and ensures the aim of the system is reasonable, necessary and proportionate.

The system will be made secure by the following safeguards:

- the system manager will be responsible for overseeing the security of the footage and recorded images, maintenance and training of authorised personnel
- the system will be check for faults each day
- the footage will be stored securely and encrypted
- the software updates will be installed as soon as possible
- the recorded footage will be password protected
- the equipment will be located in a secured lockable enclosure accessible only to authorised personnel
- adequate cyber security measures will be in place to protect footage from cyber-attacks
- a register of authorised staff is maintained, reviewed and updated when necessary

Covert recording

The School will only 'covert record' when the following criteria are met:

- an assessment concluded that if we had to inform individuals that recording was taking place it would prejudice our objective
- there is reasonable cause to suspect specific criminal activity or actions that could result in a serious breach of staff or volunteer behaviour expectations is taking place
- covert processing is carried out for limited and reasonable period of time and related to specific suspected criminal activity
- if the situation arises where the School adopts 'covert recording', there will be a clear documented procedure which sets out how the decision to record covertly was reached, by whom and the risk of intrusion on individuals

Complaints

Any complaints should be made in writing to the system manager:

- **Mrs A Sherratt, Headteacher**
- **Email address: office@st-modwens.staffs.sch.uk** Review and monitoring

Appropriate changes will be made accordingly in line with changes to legislation.

The Headteacher will communicate changes to all authorised staff members. Scheduled review date is Annually November.

APPENDIX 1: SUBJECT ACCESS REQUEST

Date of footage	
Start time of footage	
End time of footage	
Cameras of required footage	
Current time on recorder	
Time using speaking clock	
Person requesting footage	
Copy of footage has been recorded to DC/DVD/USB	
Serial number of copied media disk	

The above information and associated CCTV footage has been compiled on behalf of: St Modwen's Catholic Primary School.

The footage detail above has been compiled in accordance with the CCTV code of practice 2008. It is the recipient's responsibility to store and dispose of the recorded media in accordance with the CCTV Code of Practice 2008 and the recipients take full responsibility for the safe keeping of the footage as detailed above. A copy of the codes can be obtained by visiting www.ico.gov.uk.

St Modwen's Catholic Primary School will maintain a log of access requests detailing who the requests have been made by.

Issuer of the above footage

Name	Signature	Date

Recipient of the above footage

Name	Signature	Date
Address		
Identification		