



# **Belswains Primary School**

## **CCTV Policy**

**Agreed by Resources Committee on behalf of the  
Governing Board  
Autumn Term 2025**

**Next Review Date  
Autumn Term 2026**

**DW Reviewed: 14 June 2025**

## Rationale

Closed circuit television is installed and operated at Belswains Primary School for security and health and safety purposes. Images from the installed cameras may be viewed and recorded.

Usually, the CCTV equipment and the images recorded by it are controlled by the Headteacher and Deputy Headteacher who are responsible for how the system is used. The Site Manager and certain nominated office staff can also access the equipment under the guidance of the headteacher. Occasionally, the CCTV system may be shared with another organisation, such as a facilities management company, or an organisation that provides out-of-school hours' activities. It may be the case that, in these scenarios, there are joint data controllers responsible for the CCTV system. Where this is the case, the joint data controller is listed below.

When considering the installation of a CCTV system or upgrading an existing system where:

- the views obtained are significantly altered or enhanced,
- additional cameras are added to the system
- existing systems are extended

The school will use the 'Passport to Compliance,' issued by the Surveillance Camera Commissioner. This is to ensure that the surveillance camera system complies with the Guiding Principles set out in the Surveillance Camera Code of Practice published by the Home Office as a requirement of the Protection of Freedoms Act 2012.

## Aims

The purpose of this policy is to regulate the management, operation, and use of the CCTV system at Belswains Primary School and to ensure compliance with the current legislation.

Article 6 (1) (e) of the General Data Protection Regulation provides the school with a lawful basis for processing CCTV images where 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'.

### **Objectives of this CCTV Policy are:**

- a) To increase the personal safety of pupils, staff, and visitors, and reduce the fear of crime
- b) To protect the school buildings and its assets
- c) To support the Police in a bid to deter and detect crime
- d) To assist in identifying, apprehending and potentially prosecuting offenders and assisting with the determination any cause of accidents.
- e) To protect members of the public and private property
- f) To assist in managing the school and if needed to assist in the defense of any litigation proceedings

## Procedures

### Positioning of cameras

The system comprises a number of fixed cameras located internally and externally in and on the school building and all captured only within the school grounds. If required a list of the location of CCTV cameras will be provided within 10 working days following a request in writing to the School Office.

## Signage

Signs are positioned at the entrance to the school as required by the Code of Practice. These signs indicate that CCTV monitoring and recording are in use on the premises.

## Recording of CCTV images

Recordings may be made from any of the CCTV cameras. These recordings include the date, time, and system information overlay. The system will not record audio. Recording equipment and media will be housed in a place to which only administration and security staff have access. Recordings are automatically saved for

30 days unless required as part of an ongoing investigation, when recordings can be retained for as long as required for that investigation. At the end of the 30 days, the tapes will be recycled, and the recordings will be erased by overwriting them with new recordings. Access to this storage is restricted to the Senior Leadership Team.

The CCTV system will operate 24 hours each day, every day of the year, recording all activity in the areas covered. Cameras will be used to monitor activities within the school to identify adverse activity occurring, anticipated or perceived, and for the purpose of securing the safety and wellbeing of the school's pupils and staff, together with its visitors. At no time will a camera be directed to follow or track an individual. Materials or knowledge secured because of CCTV use will not be used for any commercial or media purpose.

The management of the CCTV system will be overseen by the members of the senior leadership team or the site manager with responsibility for the school premises. They are responsible for ensuring that the CCTV system is operated according to this policy and that regular audits are carried out to ensure that procedures are complied with. The day-to-day management, administration, maintenance, security, and support of the system will be the responsibility of the Site Manager.

### **Viewing of CCTV images**

Display equipment used to view the images from CCTV cameras is in the site manager's office and positioned in such a way as visitors to the school will not see the screen. Where a separate system display equipment is provided for controlled access security at a particular place such as a door entry point, display equipment will be located and positioned in such a way that only those likely to operate the system can view the image.

Recorded images may be viewed only after permission has been granted by the Head or Deputy Headteacher. Except for subject access requests under Data Protection Law (see below), only those who necessarily must see the image for security and health and safety purposes may do so. Recorded images may be used in material to aid the identification of individuals for crime prevention or health and safety purposes.

The only locations where images can be viewed are in the school office and in the SLT offices. The only person authorised to make copies (electronic or paper) of images is the Headteacher or Deputy Headteacher or another person specifically directed by the Headteacher.

Authorised staff may only allow external people or agencies to view CCTV images with the express permission of the Headteacher and by following the procedures below.

Requests by law enforcement agencies (most commonly the police) can be authorised by the school under the Data Protection Act 2018, Schedule 2, Part 1, Paragraph 2. A copy of images may be released to the agency on the understanding that the images remain the property of the school, and the school may refuse permission for the agency to pass the images onto any other person. Such requests should be made to the Headteacher.

Applications received from outside bodies (e.g., solicitors) to view or release footage will be referred to the Headteacher. In these circumstances footage will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, or in response to a Court Order.

Requests may come from other external individuals and consideration would need to be given to how genuine or necessary the request is and whether there is any risk to the safety of others. Where there are other individuals visible in recordings, senior staff may provide a description of incidents to ensure the protection of the individuals.

### **Subject Access Requests**

The Data Protection Legislation allows individuals whose images have been recorded the right to view the images of themselves and to have a copy of the images. This is termed as a Subject Access request. Requests of this nature should be made to the Headteacher who will arrange for still image captures to be provided within one month of the request if possible. The person making the request must give sufficient information to enable the images to be found. The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation, such as other individuals being identifiable and difficult to erase.

It is important that the school does not compromise anyone else's privacy, so you will only be able to view CCTV footage that does not contain images of third parties or images that would enable you to identify other

people. Images of other subjects would need to be edited or blanked out to make sure no one else can be identified.

This process is costly, and one which the school has the right to refuse to undertake if the costs are disproportionate. Alternatively, the costs may be passed onto the person who has made the request.

The Information Commissioner has published a separate CCTV Code of Practice detailing how to operate a system in accordance with Data Protection Legislation. Where necessary, the Headteacher or their representative will refer to this Information Commissioners' Code of Practice (sections 5.2.2 & 5.2.3) for further guidance on disclosing images to law enforcement agencies or to individuals.

In all such cases where requests are made the school will keep a detailed log (register) of the nature of the request and the details/images provided. The Headteacher, or a senior leader acting on their behalf, will initially investigate any breach of this Policy by school staff. Any serious breach of this Policy will be subject to the terms of disciplinary procedures already in place.

The Headteacher or their representative may conduct performance monitoring, including random operating checks.

### **System maintenance**

Display equipment and recordings may be viewed by personnel authorised to undertake installation and maintenance of the CCTV systems. Such viewing will be restricted to that necessary for system work.

### **Police cooperation**

The school wishes to maintain good working relations with the police and will cooperate whenever it can do so within the law.

### **Evaluation**

This policy will be evaluated annually during the summer term.

### **Twelve Guiding Principles**

#### Surveillance Camera Code of Practice

The Surveillance Camera Code of Practice sets out the following twelve guiding principles for surveillance cameras in public places:

- Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
- The use of a surveillance camera system must consider its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
- There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
- There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held, and used.
- Clear rules, policies, and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
- No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
- Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
- Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
- Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.

- There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.
- When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
- Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

### **CCTV – Privacy Notice**

Closed circuit television is installed and operated at the school for security and health and safety purposes. Images from the installed cameras may be viewed and recorded. This privacy notice explains what personal information is collected, what it is used for and to whom it is provided. The notice also describes why we require your data, and the legal basis on which we do this. This privacy notice relates to our CCTV System, including, but not limited to, where it has been installed on the outside of some of our buildings. It provides additional information that specifically relates to this particular service and should be read together with our general privacy notice.

#### **What personal information does this service use?**

The CCTV system captures images of people and vehicles in and around where a camera is located. Where fixed CCTV cameras are operating, there will be signs clearly displayed.

Images captured by CCTV will not normally be kept for longer than 30 days. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated.

#### **What is your personal information used for?**

We use your personal data for the following reasons:

- a) To increase the personal safety of pupils, staff, and visitors, and reduce the fear of crime
- b) To protect the school buildings and their assets
- c) To support the Police in a bid to deter and detect crime
- d) To assist in identifying, apprehending and potentially prosecuting offenders
- e) To protect members of the public and private property
- f) To assist in managing the school

#### **What is the lawful basis we are relying on?**

We collect and use this information to ensure the school can undertake its remit to educate children ensuring personal safety of pupils, staff, and visitors, protecting school buildings and its assets and assist in managing the school (Article 6(1)(e) of the General Data Protection Regulation).

The school will use the 'Passport to Compliance,' issued by the Surveillance Camera Commissioner to ensure that the surveillance camera system complies with the Guiding Principles set out in the Surveillance Camera Code of Practice published by the Home Office as a requirement of the Protection of Freedoms Act 2012.

#### **Where has your personal information come from?**

The images are captured because you are present in the area which is covered by the CCTV system.

#### **Who will we share your personal information with?**

Your personal data is shared securely with the following, where it is both necessary and appropriate to do so:

- Relevant staff within the school
- Our local authority
- The Police

#### **How long will we keep your information?**

Our retention schedule sets out how long we keep personal information for and is available on request.

### **Your personal information and your rights**

To read about what rights you have regarding the personal information used for this service, please see our general privacy notice.

### **Updates**

We may change this privacy notice from time to time.

If you have any questions or concerns about how we use your personal information, please contact the school office:

You also have the right to complain to the Information Commissioner's Office if you are unhappy about how we process your information.