



CCTV policy

Staff Member(s) responsible	L Tibbs, Headteacher
Governor(s) responsible	Chair of Governors
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1. Aims

This policy aims to set out the Academy’s approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on school property.

1.1 Statement of intent

The purpose of the CCTV system is to:

- Make members of the Academy community feel safe
- Protect members of the Academy community from harm to themselves or to their property
- Deter criminality in the Academy
- Protect Academy assets and buildings
- Assist the police to deter and detect crime
- Determine the cause of accidents
- Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings
- To assist in the defense of any litigation proceedings

The CCTV system will not be used to:

- Encroach on an individual's right to privacy
- Follow particular individuals, unless there is an ongoing emergency incident occurring
- Pursue any other purposes than the ones stated above

The list of uses of CCTV is not exhaustive and other purposes may be or become relevant. This policy will be reviewed annually to reflect any changes in use and any significant change will be subject to consultation with those who would be affected.

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

Footage or any information gleaned through the CCTV system will never be used for commercial purposes.

In the unlikely event that the police request that CCTV footage be released to the media, the request will only be complied with when written authority has been provided by the police, and only to assist in the investigation of a specific crime.

2. Relevant legislation and guidance

This policy is based on:

2.1 Legislation

- [UK General Data Protection Regulation](#)
- [Data Protection Act 2018](#)
- [Human Rights Act 1998](#)
- [European Convention on Human Rights](#)
- [The Regulation of Investigatory Powers Act 2000](#)
- [The Protection of Freedoms Act 2012](#)
- [The Education \(Pupil Information\) \(England\) Regulations 2005 \(as amended in 2016\)](#)
- [The Freedom of Information and Data Protection \(Appropriate Limit and Fees\) Regulations 2004](#)
- [The School Standards and Framework Act 1998](#)
- [The Children Act 1989](#)
- [The Children Act 2004](#)
- [The Equality Act 2010](#)

2.2 Guidance

- [Surveillance Camera Code of Practice \(2021\)](#)

3. Definitions

Surveillance: the act of watching a person or a place

CCTV: closed circuit television; video cameras used for surveillance

4. Location of the cameras

Cameras are located in places that require monitoring in order to achieve the aims of the CCTV system (stated in section 1.1). Cameras locations are reviewed periodically to ensure that they continue to be needed.

- In line with legislation and good practice, signage is located in strategic places around the site. The signage:
 - Identifies the school as the operator of the CCTV system
 - Identifies the school as the data controller
 - Provides contact details for the school

Cameras are not and will not be aimed off school grounds into public spaces or people's private property.

Cameras are positioned in order to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

5. Roles and responsibilities

5.1 The governing board

The governing board has the ultimate responsibility for ensuring the CCTV system is operated within the parameters of this policy and that the relevant legislation (defined in section 2.1) is complied with.

5.2 The headteacher

The headteacher will:

- Take responsibility for all day-to-day leadership and management of the CCTV system
- Liaise with the data protection officer (DPO) to ensure that the use of the CCTV system is in accordance with the stated aims and that its use is needed and justified
- Ensure that the guidance set out in this policy is followed by all staff
- Review the CCTV policy to check that the school is compliant with legislation
- Ensure all persons with authorisation to access the CCTV system and footage have received proper training from the DPO in the use of the system and in data protection
- Sign off on any expansion or upgrading to the CCTV system, after having taken advice from the DPO
- Decide, in consultation with the DPO, whether to comply with disclosure of footage requests from third parties

5.3 The data protection officer (DPO)

The Director of Business and Finance will act as the DPO. With regards to this policy the DPO will:

- Train persons with authorisation to access the CCTV system and footage in the use of the system and in data protection

- Deal with subject access requests in line with the UK GDPR and Data Protection Act 2018
- Monitor compliance with UK data protection law
- Act as a point of contact for communications from the Information Commissioner's Office (ICO)
- Ensure data is handled in accordance with data protection legislation
- Ensure footage is obtained in a legal, fair and transparent manner
- Ensure footage is destroyed when it falls out of the retention period
- Keep accurate records of all data processing activities and make the records public on request
- Ensure that the CCTV systems are working properly
- Ensure that the CCTV system is not infringing on any individual's reasonable right to privacy in public spaces
- Carry out termly checks to determine whether footage is being stored accurately, and being deleted after the retention period
- Receive and consider requests for third-party access to CCTV footage

5.4 The system manager

The CCTV system will be managed through our SLA with Entrust. They will designate the system manager. The system manager will:

- Take care of the day-to-day maintenance and operation of the CCTV system
- Oversee the security of the CCTV system and footage
- Check the system for faults and security flaws termly
- Ensure the data and time stamps are accurate termly

6. Operation of the CCTV system

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

The system is registered with the Information Commissioner's Office.

The system will not record audio.

Recordings will have date and time stamps. This will be checked by the system manager termly and when the clocks change.

7. Storage of CCTV footage

Footage will be retained routinely for 21 days. At the end of the retention period, the files will be overwritten automatically.

On occasion footage may be retained for longer than 21 days, for example where a law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation. The decision to extend the retention period will be taken by the

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

The DPO will carry out termly checks to determine whether footage is being stored accurately, and being deleted after the retention period.

8. Access to CCTV footage

Access will only be given to authorised persons, for the purpose of pursuing the aims stated in section 1.1, or if there is a lawful reason to access the footage.

Any individuals that access the recorded footage must record their name, the date and time, and the reason for access in the access log.

Any visual display monitors will be positioned so only authorised personnel will be able to see the footage. Any unauthorised viewing of CCTV footage will be reported immediately to the Headteacher and investigated.

8.1 Staff access

The following members of staff have authorisation to access the CCTV footage:

- The headteacher: Lindsay Tibbs
- The deputy head: Tim Tweats/ Craig Bailey
- The DPO: Anne Jones
- The system manager: Entrust
- Anyone with express permission of the headteacher
- Caretakers

CCTV footage will only be accessed from authorised personnel's work devices, or from the visual display monitors.

All members of staff who have access will undergo training to ensure proper handling of the system and footage.

Any member of staff who misuses the surveillance system may be committing a criminal offence, and will face disciplinary action.

8.2 Subject access requests (SAR)

According to the UK GDPR and Data Protection Act 2018, individuals have the right to request a copy of any CCTV footage of themselves. This right extends to parents of those under the age of 18.

Anyone wishing to make a SAR should complete Appendix 1 from this document and return to Mrs A Jones, the DPO. Upon receiving the SAR the school will immediately issue a receipt and will then respond within 1 calendar month. When making a request, individuals should provide the school with reasonable information such as the date, time and location the footage was taken to aid school staff in locating the footage.

Due to safeguarding and GDPR reasons, the school will not normally release footage from CCTV cameras which includes other students. The school may release still footage if it is possible to conceal the identities of other students and staff.

8.3 Third-party access

CCTV footage will only be shared with a third party to further the aims of the CCTV system set out in section 1.1 (e.g. assisting the police in investigating a crime).

All requests for access should be set out using Appendix 2 from this policy and sent to the headteacher and the DPO.

The school will comply with any court orders that grant access to the CCTV footage. The school will provide the courts with the footage they need without giving them unrestricted access. The DPO will consider very carefully how much footage to disclose, and seek legal advice if necessary.

The DPO will ensure that any disclosures that are made are done in compliance with the UK GDPR.

All disclosures will be recorded by the DPO.

9. Security

- The system manager will be responsible for overseeing the security of the CCTV system and footage
- The system will be checked for faults once a term
- Any faults in the system will be reported as soon as they are detected and repaired as soon as possible, according to the proper procedure
- Footage will be stored securely and encrypted wherever possible
- The CCTV footage will be password protected and any camera operation equipment will be securely locked away when not in use
- Proper cyber security measures will be put in place to protect the footage from cyber attacks
- Any software updates (particularly security updates) published by the equipment's manufacturer that need to be applied, will be applied as soon as possible
- Any breaches in security will be reported to the headteacher and fully investigated

10. Complaints

Complaints should be directed to the headteacher and should be made according to the school's complaints policy.

11. Monitoring

The policy will be reviewed annually by the headteacher and the DPO to consider whether the continued use of a surveillance camera remains necessary, proportionate and effective in meeting its stated purposes.

12. Links to other policies

- Data Protection

- Privacy notices for parents/carers, pupils, staff, governors and contractors
- Safeguarding policy
- Staff code of Conduct

Appendix 1

Subject Access Request (SAR) relating to CCTV images

You are reminded that making false or misleading statements in order to obtain access to personal information to which you are not entitled is a criminal offense.

- **Applicants Details**

Name	
Date of Birth	
Address	
Email address	
Telephone number	

If the data subject is under the age of 16 then please provide details of their parents/carers and the fact they give permission for this SAR.

Parent/carers name	
I give permission for this SAR (sign) / date	

Footage required:

Date and Time	
Location of the camera	
Any identifying features (e.g. what you were wearing)	

Once completed please return this form to Mrs A Jones – a.jones@alleynes.staffs.sch.uk

We will contact you on receipt of this SAR. Please note that CCTV images are only held for 21 days.

Appendix 2 – Form CCTV 2

Access to view or request images – police/3rd parties

Name of person making the request	
Organisation	
Address	
Telephone number	
Contact email	

Details of the image to be viewed

Date and time of footage	
Location of footage	
Reason for this footage needing to be released	

Authorisation – can only be given by Headteacher

Permission granted (signed)	
Date	
Reason permission was not granted	

Details if footage is released

Date footage released	
Name of person given the footage	
Linked crime number	
Method of release	
Footage returned or destroyed	

