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# CCTV POLICY

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Policy approved by	IEB
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## 1. Introduction

This policy outlines the purpose, operation, and governance of the closed-circuit television (CCTV) system at Little Heaton CE Primary School. It ensures the school meets its statutory responsibilities in relation to safeguarding, data protection, and health and safety while protecting individual privacy rights under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### 1.1 System Details

- Data Controller: Little Heaton CE Primary School
- System Manager: Chloe Noon, Headteacher
- CCTV System: Ademco CCTV System

## 2. Purpose of the CCTV System

The CCTV system is in place for the following lawful purposes:

- To deter and detect crime
- To reduce the fear of crime
- To protect the safety of pupils, staff, visitors, and property
- To monitor incidents of poor behaviour or misconduct where necessary
- To support the school in fulfilling statutory Health and Safety obligations
- To monitor and support emergency planning responses

The system will only be used for the purposes outlined above. Any use outside of these parameters must be explicitly authorized and legally justified.

## 3. Roles and Responsibilities

- Data Controller: The School holds responsibility for all data captured.
- System Manager: The Headteacher is responsible for the day-to-day management of the CCTV system, including ensuring the security of images, authorising access, and overseeing appropriate use.
- Data Protection Officer: Shane Williams, Global Policing (Tel: 0161 212 1681) supports compliance with data protection legislation.

## 4. Operation and Access

- The CCTV system comprises a mix of fixed and moveable cameras, which record in real-time.
- Footage is retained securely for no longer than 30 days unless required for evidential purposes.
- Access to live or recorded images is restricted to trained and authorised personnel only.
- Access by third parties, including police, must follow strict protocols and be approved by the System Manager.
- Audio recording is not used unless explicitly signed and justified.

## 5. Compliance with UK GDPR and Data Protection Act 2018

The school ensures that all personal data obtained via the CCTV system is:

- Processed lawfully, fairly, and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant, and limited to what is necessary
- Accurate and kept up to date
- Retained only for as long as necessary
- Processed securely to prevent unauthorised access or loss

Subject access requests for CCTV footage should be submitted in writing to the Headteacher. Identity verification will be required, and third-party identities may be redacted, or consent obtained before disclosure.

## 6. Monitoring and Maintenance

- Cameras will not be used to observe areas of private residential property.
- All cameras are installed visibly, with signage clearly stating CCTV use.
- A record is kept of all requests for footage and decisions made.
- The system is subject to annual audits and reviewed for effectiveness.
- Equipment is maintained regularly by qualified engineers to ensure quality and compliance.

## 7. Use in School Proceedings and Safeguarding

Footage may be used to:

- Support investigations into safeguarding incidents
- Verify behavioural incidents when no other evidence exists
- Assist in staff or pupil disciplinary proceedings (when proportionate and lawful)

Footage must not be used punitively or where its use would be excessive or breach privacy rights.

Authorisation must be obtained from the System Manager and, where necessary, advice sought from the Trust's legal team or Data Protection Officer.

## 8. Public Awareness and Complaints

- Signage at school entrances and within the building will inform individuals of CCTV usage.
- Individuals wishing to make a complaint about CCTV operation can do so via the school's Complaints Policy, available on the website or from the school office.

## 9. Review and Evaluation

This policy will be reviewed every three years or sooner if legislation, best practice, or system changes require it. Evaluation will consider:

- Effectiveness of the system
- Compliance with legal obligations
- Community feedback
- Cost effectiveness