



# HOLYWELL VILLAGE FIRST SCHOOL

## CCTV POLICY

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Headteacher: \_\_\_\_\_ Date: 25.03.26

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# Holywell Village First School

## CCTV Policy

### Safeguarding Statement

The school is committed to safeguarding children and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

Holywell Village First School uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and to monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.

CCTV surveillance at the school is intended for the purpose of:

- Protecting the school buildings and school assets, both during and after school hours;
- Promoting the health and safety of staff, pupils and visitors;
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- Support the Police in a bid to deter and detect crime;
- Assisting in identifying, apprehending and prosecuting offenders; and
- Ensuring that the school rules are respected so that the school can be properly managed.

The CCTV system is owned and operated by the school and the deployment of which is determined by the school's headteacher. The CCTV is a standalone system and operated by the school.

The CCTV is monitored centrally from the school office by the School Manager.

The school's CCTV is registered with the Information Commissioner under the terms of the Data Protection Act (GDPR). This policy outlines the school's use of CCTV and how it complies with the Act.

All authorised operators the access to recorded images are aware of the procedures that need to be followed when accessing the images. All employees are aware of the restrictions in relation to access to and disclosure of recorded images.

The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of the CCTV security technologies for the purposes is prohibited by this policy e.g CCTV will not be used for monitoring employee performance.

### Justification for Use of CCTV

The use of CCTV for safety and security purposes has been deemed to be justified by the Headteacher and Governing Body. The system is intended to capture images/video footage of intruders or of individual damaging property or removing goods without authorisation or of anti-social behaviour.

## **Location of Cameras**

Cameras will be sited so they capture images relevant to the purpose for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated.

The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act (GDPR). The school will make every effort to position cameras so that their coverage is restricted to the school premises, including external areas of the school site e.g. school gates.

CCTV will not be used in classrooms.

Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. Holywell Village First School has endeavoured to select locations for the installation of CCTV which are least intrusive to protect the privacy of individuals.

Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property

CCTV Video Monitoring and Recording of Public Areas may take place for the following purposes:

- Protection of school buildings and property: the building's perimeter, entrances and exits, office locations, receiving areas for goods/services
- monitoring of Access Control Systems: monitor and record restricted access areas at entrances to buildings and surrounding grounds
- Verification of Security Alarms: Intrusion alarms, exit door controls, external alarms
- Video Patrol of Public Areas: Parking areas, main entrance/gates, Pedestrian entrance/gate, traffic control on site
- Criminal Investigations (carried out by Police): Robbery, burglary and theft surveillance

## **Covert Surveillance**

- Holywell Village First School will not engage in covert surveillance.

## **Notification**

- A copy of this CCTV Policy will be provided on request to staff, students, parents/carers and visitors to the school and will be made available on the school website.
- The location of CCTV cameras will also be indicated and adequate signage will be placed at each location in which CCTV camera(s) is sited to indicate that CCTV is in operation.
- Adequate signage is prominently displayed at the entrance to the school property. Signage includes that name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in each location.

## **Storage and retention**

The images captured by the CCTV system will be retained for a maximum of 30 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment,

Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV system is the responsibility of the School Manager.

In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

### **Access**

Recorded footage and the monitoring equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel.

Access to the CCTV system and stored images will be restricted to Authorised personnel only. The system can only be accessed by password encryption from the School Manager.

A record of the date of any disclosure request along with the details of who requested the information has been provided (name of the individual and the organisation they represent), why they required it and how the request was dealt with will be made and kept by the School Manager, in case of challenge.

Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

In relevant circumstances, CCTV footage may be accessed:

- By the Police where Holywell Village First School are required by law to make a report regarding the commission of a suspected crime; or
- Following a request by the Police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on the school's property, or
- To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the Headteacher in establishing facts in cases of unacceptable pupil behaviour, in which case parents/carers will be informed; or
- To data subjects (or their legal representatives) subject to court order

To the school insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

### **Subject Access Requests (SAR)**

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act (GDPR).

Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to themselves to be identified. For example, date, time, location.

The school will respond within 30 calendar days of receiving the request in line with the school's data retention policy.

The school reserves the right to refuse CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

A record of the date of disclosure along with details of who the information has been provided to (name of the person and the organisation they represent) and why they require it will be made.

In giving a person a copy of their data, the school provide a still/series of pictures or a disk of relevant images. However, the images of other individuals will be obscured before the data is released.

Where footage contains images relating to 3<sup>rd</sup> parties, school will take appropriate steps to mask and protect the identities of those individuals

## **Complaints**

Complaints and enquiries about the operation of CCTV within the school should be directed to the School Manager in the first instance. Contact can be made via the School Office.

## **Staff Training**

Staff authorised to access the CCTV system will be trained to comply with this policy. Staff will understand that all information relating to the CCTV images must be handled securely and have appropriate training to enable them to identify and handle different requests, according to regulations.

Staff misuse of surveillance system information will lead to disciplinary proceedings.

## **Responsibilities**

The School Manager and Headteacher will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Holywell Village First School
- Oversee and co-ordinate the use of CCTV monitoring and security purposes within school
- Ensuring that all existing CCTV monitoring equipment systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at Holywell Village First School is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any material recorded or stored in the system
- Ensure the monitoring records are not duplicated for release
- Ensure that the perimeter of view from fixed location cameras confirms to policy both internally and externally
- Give consideration to both student and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place
- Co-operate with the Health and Safety Governor/Officer in reporting on the CCTV system in operation in school

- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing where possible and comply with the principle of “Reasonable Expectation of Privacy”
- Ensure that monitoring footage are stored in a secure place with access by authorised personnel only
- Ensure that images/digital recordings are stored for a period of not longer than 30 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal; or civil)
- Ensure that camera control is purely to monitor suspicious behaviour, criminal damage etc and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual’s reasonable expectation of privacy in public areas

<b>Version</b>	<b>Reason for Amendments/Update/Review</b>	<b>Date of Adoption</b>	<b>Date of next review</b>
1.0	New policy and procedure	March 2026	March 2028