

CCTV Policy

Name of School	Church Crookham Junior School
Date of Policy Issue/Review	Spring Term 2025 (date of review: Spring Term 2026)

Introduction	
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Our school strives to create a positive, safe and caring environment where children have a strong sense of belonging and staff work hard to build positive relationships with all pupils, parents and members of our school community. “Achievement by All” lies at the heart of what we do and we live our five core values of kindness, respect, imagining, resilience and reflection. This policy aims to set out the school’s approach to the operation, management and usage of closed-circuit television (CCTV) systems on school property.

Statement of Intent

The purpose of the CCTV system is to:

- Deter criminality on the school grounds
- Protect school assets and buildings
- Assist police to deter and detect crime
- To assist in the defense of any litigation proceedings
- Protect members of the school community from harm to themselves or to their property
- Make members of the school community feel safe

The CCTV system will not be used to:

- Encroach on an individual's right to privacy
- Monitor people in spaces where they have a heightened expectation of privacy (including toilets and changing rooms)
- 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.

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.

The footage generated by the system should be of good enough quality to be of use to the police or the court in identifying suspects. CCTV footage will not be shared or copied for any other audiences (such as parents or carers).

Exemplar template forms are included in the appendices.

Relevant Legislation and Guidance	
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This policy is based on legislation from:

- [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 Freedom of Information Act 2000](#)
- [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](#)

This policy is based on guidance from: [Surveillance Camera Code of Practice \(2021\)](#)

Definitions	
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Surveillance: the act of watching a person or a place

CCTV: closed circuit television; video cameras used for surveillance

Covert surveillance: operation of cameras in a place where people have not been made aware they are under surveillance

Covert Surveillance	
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Covert surveillance will only be used in extreme circumstances, such as where there is suspicion of a criminal offence. If the situation arises where covert surveillance is needed (such as following police advice for the prevention or detection of crime or where there is a risk to public safety), a data protection impact assessment will be completed in order to comply with data protection law.

Additionally, the proper authorisation forms from the Home Office will be completed and retained where necessary.

Location of the Cameras	
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Cameras are located in places that require monitoring in order to achieve the aims of the CCTV system (stated in section 1.1).

There are 3 cameras in total, on the corners of the school buildings aimed at the main entrance and exit points of the school gates.

Wherever cameras are installed appropriate signage is in place to warn members of the school community that they are under surveillance. 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.

Roles and Responsibilities	
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The Governing Body

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 (as defined above) is complied with.

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 and having taken into account the result of a data protection impact assessment

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- Decide, in consultation with the DPO, whether to comply with disclosure of footage requests from third parties

The Data Protection Officer

The Data Protection Officer (DPO) will:

- Train persons with authorisation to access the CCTV system and footage in the use of the system and in data protection
- Train all staff to recognise a subject access request
- Deal with subject access requests in line with the Freedom of Information Act (2000)
- Monitor compliance with UK data protection law
- Advise on and assist the school with carrying out data protection impact assessments
- Act as a point of contact for communications from the Information Commissioner's Office
- Conduct data protection impact assessments
- 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
- Inform subjects of how footage of them will be used by the school, what their rights are, and how the school will endeavour to protect their personal information
- Ensure that the CCTV systems are working properly and that the footage they produce is of high quality so that individuals pictured in the footage can be identified
- Ensure that the CCTV system is not infringing on any individual's reasonable right to privacy in public spaces
- Carry out regular 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

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 regularly
- Ensure the data and time stamps are accurate regularly

Operation of the CCTV System	
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The CCTV system will be operational between 3.30 -8.30am during the school day and 24 hours a day during holidays and weekends.

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

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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.

Storage of CCTV Footage	
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Footage will be retained for 30 days. At the end of the retention period, the files will be overwritten automatically.

On occasion footage may be retained for longer than 30 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.

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.

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

Any individuals that access the 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.

Staff Access

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

- The headteacher
- The deputy head
- The assistant head
- The data protection officer
- The system manager
- Anyone with express permission of the headteacher

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.

Subject Access Requests (SAR)

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According to UK GDPR and Data Protection Act 2018, individuals have the right to request a copy of any CCTV footage of themselves.

Upon receiving the subject access request the school will immediately issue a receipt and will then respond within 1 calendar month.

Our Data Protection Officer and Senior Leaders have received training to recognise SARs. When a SAR is received staff should inform the DPO. 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.

On occasion the school will reserve the right to refuse a SAR, if, for example, the release of the footage to the subject would prejudice an ongoing investigation.

Images that may identify other individuals need to be obscured to prevent unwarranted identification. The school will attempt to conceal their identities by blurring out their faces, or redacting parts of the footage. If this is not possible the school will seek their consent before releasing the footage. If consent is not forthcoming the still images may be released instead.

The school reserves the right to charge a reasonable fee to cover the administrative costs of complying with a SAR that is repetitive, unfounded or excessive.

Footage that is disclosed in a SAR will be disclosed securely to ensure only the intended recipient has access to it.

Records will be kept that show the date of the disclosure, details of who was provided with the information (the name of the person and the organisation they represent), and why they required it.

Individuals wishing to make an SAR can find more information about their rights, the process of making a request, and what to do if they are dissatisfied with the response to the request on the [ICO website](#).

Third-Party Access

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

Footage will only ever be shared with authorised personnel such as law enforcement agencies or other service providers who reasonably need access to the footage (e.g. investigators).

All requests for access should be set out in writing 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 UK GDPR.

All disclosures will be recorded by the DPO.

It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The CCTV sign should cover:

- The area covered by the CCTV
- The purposes of using CCTV
- The name of the school
- The contact telephone number or address for enquiries.

Example Sign



WARNING
CCTV Cameras in Operation

Images are being monitored and recorded for the purposes of crime prevention, the prevention of anti-social behaviour, for the safety of our school community and the protection of the school and its property. This system is in operation 24 hours a day during holidays and weekends and, during term time 3.30pm-8.30am. These images may be passed to the police. This scheme is controlled by the School and for more information contact adminoffice@crookham-jun.hants.sch.uk

Data Protection Impact Assessment (DPIA)	
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The school follows the principle of privacy by design. Privacy is taken into account during every stage of the deployment of the CCTV system, including its replacement, development and upgrading.

The system is used only for the purpose of fulfilling its aims, as stated in this school policy.

When the CCTV system is replaced, developed or upgraded a DPIA will be carried out to be sure the aim of the system is still justifiable, necessary and proportionate.

The DPO will provide guidance on how to carry out the DPIA.

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Those whose privacy is most likely to be affected, including the school community and neighbouring residents, will be consulted during the DPIA, and any appropriate safeguards will be put in place.

A new DPIA will be completed cameras are moved or new cameras are installed.

If any security risks are identified in the course of the DPIA, the school will address them as soon as possible.

Security	
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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

Complaints	
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Complaints should be made according to the school's complaints policy. Any complaints about timescales relating to a Subject Access Request or procedures related to a Subject Access Request should be directed to the ICO) www.ico.org.uk

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

Links to Other Policies	
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- Data protection policy
- Biometric data policy
- Privacy notices for parents, pupils, staff, governors and suppliers
- Safeguarding policy

Review	
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This policy was agreed on 27.01.2025

This policy will be reviewed Spring Term 2026.

Appendix One: CCTV System Oversight Log

Section 1: System Access Details

- **Date of Access:** _____
- **Time of Access:** _____
- **Name of System Manager:** _____
- **Purpose of Access:**
 - Routine System Check
 - Fault Investigation
 - Security Review
 - Date/Time Synchronization
 - Other: [Specify]

Section 2: Security and Functionality Checklist

- **CCTV Cameras Functioning Correctly:** Yes No (If no, specify issues below)
- **Footage Quality Adequate:** Yes No (If no, specify issues below)
- **Date and Time Stamps Accurate:** Yes No (If no, detail corrective actions below)
- **System Security Check:** Completed Issues Found (Specify below)
- **Review of Access Logs for Unusual Activity:** Completed Issues Found

Observations/Issues Noted:

[Provide detailed notes about faults, discrepancies, or security flaws.]

Actions Taken or Recommendations:

[Specify actions taken to resolve issues, or recommended next steps.]

Section 3: Authorization

- **Manager's Signature:** _____
- **Date:** _____
- **Security Review (if applicable):** Required Not Required

This form can be stored securely for auditing and compliance purposes and updated regularly to reflect your organization's data protection and privacy requirements (e.g., GDPR, if applicable).

Appendix 2 – Surrender of stored imagery to Police

SURRENDER OF STORED IMAGERY TO POLICE

In the event that stored imagery is required for evidential or investigation purposes, advance permission is required from the headteacher

I (signature) _____ being one of the above named, authorise release of stored imagery,

Date/Time/Location _____ - _____

to the police on _____ (date).

The receiving Police Officer is required to sign for receipt below:

I (signature) _____ being a Police Officer, warrant card number _____ Assigned to _____ Police Station, acknowledge receipt of recorded imagery,

(Date/Time) _____ On _____ (date) from

Church Crookham Junior School for the purpose of investigation with regard to Incident index number _____

Appendix 2: Data Protection Act 2018 request form for access to CCTV images

DATA PROTECTION ACT 2018 REQUEST FORM FOR ACCESS TO CCTV IMAGES

Under the Data Protection Act 2018, people have the right to request an organisation where they hold your personal data and see a copy of that information.

Please complete this form and return together with the necessary verification details if you wish to have access to CCTV footage. On completion this form should be returned to the Data Protection Officer at Church Crookham Junior School. A response will be provided within 30 days of receipt of the completed form and proof of photographic identity.

Declaration: I understand that any information I obtain from is protected under the Data Protection Act 2018. Under the Data Protection Act 2018, should other people are included in the footage, permission would need to be sought from them before providing the footage. If any permission is denied from others in the footage, then still images with anyone with no permission will have their images blurred or blocked out.

Signed:..... Date:.....

Details of Person Requesting Access

Print Full Name

Address.....

Contact number Date completed/...../.....

The expected date and times of the CCTV footage:
.....
.....

Brief description of the applicant's appearance and likely activities captured by CCTV
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Date and times of Image(s) requested

Location / Camera

Type of access required: Viewing / Copy of image / Other

Please return this form together with the administration fee, with proof of photographic identity such as passport, driving licence or utility bill showing name address dated within last 3 months.

Item 1 (e.g. passport)

Item 2