



The Henslow School CCTV policy

Contents

1. Aims	2
2. Relevant legislation and guidance	3
3. Definitions	3
4. Covert surveillance	3
5. Location of the cameras	3
6. Roles and responsibilities	4
7. Operation of the CCTV system	5
8. Storage of CCTV footage	5
9. Access to CCTV footage	5
10. Data protection impact assessment (DPIA)	6
11. Security	7
12. Complaints	7
13. Monitoring	7
14. Links to other policies	7

1. Aims

This policy aims to set out the school'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 school community feel safe
- Protect members of the school community from harm to themselves or to their property
- Deter criminality in the school
- Protect school assets and buildings
- Assist 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
- 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 will be regularly reviewed.

Footage or any information gleaned through the CCTV system will never be used for commercial purposes. It will only be used for the purposes stated in this policy unless the law permits otherwise.

The footage generated by the system is of good enough quality to be of use by the police or the court in identifying suspects.

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

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

4. Covert surveillance

The Henslow and Evolution school will not carry out covert surveillance with the use of the installed CCTV cameras. No cameras are in place for the purpose of covert monitoring.

5. 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 are located in:

- **Main school House**
 - Reception corridor (both ends)
 - Landing corridor
- **Annex 1**
 - Main corridor area

Conservatory

➤ **Annex 2**

External only

➤ **Cottage**

External only

➤ **External**

Playground, field, car park and garden areas as well as entrance points

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
- Identifies the purpose of the CCTV system
- 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 and minimise privacy intrusion, but there is no guarantee that all incidents will be captured on camera.

6. Roles and responsibilities

6.1 The Proprietors

The proprietary 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.

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

6.3 The data protection officer (DPO)

The DPO will:

- Provide guidance to persons with authorisation to access the CCTV system and footage in application of data protection
- Train all staff to respond appropriately to a subject access request
- Support the processing of subject access requests in line with the UK GDPR and Data Protection Act 2018

Commented [RM1]: The signs should really include the purpose as well

Commented [RM2]: I9.2 gives this

- Help the school 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 (ICO)
- Ask the school to ensure data is handled in accordance with data protection legislation
- Ask the school to ensure footage is obtained in a legal, fair and transparent manner
- Ask the school to 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
- Support the school to 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
- Ask the school to ensure that the CCTV system is not infringing on any individual's reasonable right to privacy in public spaces
- Receive and consider requests for third-party access to CCTV footage

6.4 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
- Ensure the data and time stamps are accurate
- Carry out checks to determine whether footage is being stored accurately, and being deleted after the retention period

7. Operation of the CCTV system

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

The system does record audio.

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

Commented [RM3]: Is it? If so why?

8. Storage of CCTV footage

Footage will be securely retained for up to 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 saved safely, so that the data will be secure and its integrity maintained, so that it can be used as evidence if required.

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

9. Access to saved 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 visual display monitors used to play back saved footage will be positioned so only authorised personnel will be able to see the footage.

9.1 Staff access

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

- The headteacher: Jacqui Brooks
- The system manager: Julie Griffiths
- 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 the training required 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.

All staff access to footage will be logged and the record maintained.

9.2 Subject access requests (SAR) / Freedom of Information requests (FOI)

If the school receives a request for CCTV footage from an individual who believes their image or that of their child's is contained in the footage, this will be processed as a subject access request. Please see the schools Data Protection Policy for further information.

If the school receives a request for CCTV footage from an individual and the footage does not contain an image of the requester and/or their child, this will be processed as an FOI request.

All staff have received training to recognise SARs. When a SAR is received the Head Teacher should inform the DPO in writing. 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.

Some request for footage maybe refused if any relevant exemption from the Uk Data Protection Act/GDPR 2018 and/or FOI Act 2000 applies.

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 redacted still images could be released instead.

Footage that is disclosed in a SAR will be disclosed securely to ensure only the intended recipient has access to it. The DPO will be consulted to consider how this is done in each case.

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.

9.3 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).

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 the UK GDPR.

All disclosures will be recorded by the school.

10. Data protection impact assessment (DPIA)

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.

Commented [RM4]: Have we done one of these yet?

The system is used only for the purpose of fulfilling its aims (stated in section 1.1).

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. The DPIA will be carried out by the Head Teacher in consultation with the DPO.

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 done whenever 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.

11. Security

- The system manager along with the Head Teacher will be responsible for overseeing the security of the CCTV system and footage
- The system will be checked for faults if a fault is indicated
- 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
- The CCTV footage will be password protected
- 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

12. Complaints

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

13. Monitoring

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

14. Links to other policies

- Data protection policy
- Safeguarding policy

Approved by:	Jacqui Brooks	Date: 14/08/25
---------------------	---------------	-----------------------

Last reviewed on:	Sep 2025
--------------------------	----------

Next review due by:	Sep 2026
----------------------------	----------