

Roberttown C of E

Primary School

CCTV Policy



Approved by:	Governing Body	Date: Sept 26
Last reviewed on:	23.09.26	
Next review due by:	Sept 27	

1. Aims

Roberttown school uses closed circuit television (CCTV) images to reduce crime and 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. The CCTV is not for surveillance use.

This policy covers the use of the CCTV system following a Data Protection Impact Assessment and is based on a template provided by Kirklees Local Authority.

2. CCTV Policy

- 2.1 The system comprises of 13 fixed cameras.
- 2.2 The system does not have sound recording capability.
- 2.3 The CCTV system is owned and operated by the school.
- 2.4 The CCTV is monitored centrally from the school office
- 2.5 The school is registered as a data controller with the Information Commissioner under the terms of GDPR and the Data Protection Act 2018. The use of CCTV and the associated images are covered by the data protection legislation.
- 2.6 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the school data controller in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images. Breaches of the code of practice by staff may lead to disciplinary action and possible criminal proceedings.

3. Statement of Intent

- 3.1 The school complies with the [Surveillance Camera Code of Practice \(2021\)](#) to ensure it is used responsibly and safeguards both trust and confidence in its continued use.
- 3.2 CCTV warning signs will be clearly and prominently placed, including at relevant external entrances to the school. Signs will contain details of the purpose for using CCTV (see appendix B). In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.
- 3.3 CCTV is included in the school's privacy notices available on the school website to be transparent to all stakeholders about the collection of CCTV images.
- 3.4 The planning and design have endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

4. Siting the Cameras

- 4.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) 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 data protection legislation.

- 4.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises.
- 4.3 CCTV will not be used in classrooms.
- 4.4 Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

5. Covert Monitoring

- 5.1 The school may in exceptional circumstances set up covert monitoring. For example:
 - i) Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
 - ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- 5.2 In these circumstances' authorisation must be obtained from a member of the senior management team.
- 5.3 Covert monitoring must cease following completion of an investigation.
- 5.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilets.

6. Storage and Retention of CCTV images

- 6.1 Recorded data will not be retained for longer than is necessary, and will usually be deleted after 30 days, unless it is recognised that it is needed for the purpose of an investigation, in which case it is retained until completion of that investigation. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.
- 6.2 All retained data will be stored securely. When the retention period has passed, the data will be removed or erased and documented.

7. Access to CCTV images

- 7.1 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available, unless authorised and documented by the Headteacher, stating the reason for the authorisation. At Roberttown school only the following staff have authorisation to access CCTV images with good reason to do so: these staff have received appropriate training and been issued with the school's CCTV policy:

Name	Position	Date
LHorsfall	Head Teacher	Nov 2025
L Wood	Deputy Head Teacher	Nov 2025

R Clarke	School Business Manager	Sept 2026
A Pickering	Senior Business Support Officer	Nov 2025

8. Subject Access Requests (SAR)

- 8.1 Individuals have the right to request access to CCTV footage relating to themselves under data protection legislation.
- 8.2 Requests can be made by any method of communication to anybody within the organisation. We may ask individuals to complete a subject access request form and to provide proof of identity. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
- 8.3 The school will respond to requests within one calendar month of receiving the request.
- 8.4 All requests will be documented, including whom the request was from, the response received and date of response on the school's SAR log.
- 8.5 There is no charge for the completion of a subject access request, unless the request is repeated or excessive.
- 8.6 The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.
- 8.7 Full details of the SAR procedure are available in the Data Protection Policy.

9. Access to and Disclosure of Images to Third Parties

- 9.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).
- 9.2 Requests should be made in writing to the Headteacher.
- 9.3 The data may be used within the school's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.
- 9.4 The data may also be used and shown to students and/or parents as appropriate, in relation to student disciplinary and/or suspension processes and parental complaints.

10. Complaints

- 10.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance

11. Linked Policies

This policy links to the following school policies

- Data Protection Policy
- LAMAT - Data Retention Policy 2025
- LAMAT - E-Safety Policy 0126

Further Information

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition 2014 (published by the Information Commissioners Office)
- Regulation of Investigatory Powers Act (RIPA) 2000
- EU General Data Protection Legislation
- Data Protection Act (2018)

Appendix A - Checklist

This CCTV system and the images produced by it are controlled by the Headteacher who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose.

Roberttown school has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of all stakeholders. The data may be used within the school's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures. We conduct an annual review of our use of CCTV.

	Checked (Date)	By	Date of next review
The school is registered with the ICO as a data controller.	23/09/2026	R Clarke	23/09/2027
There is a named individual who is responsible for the operation of the system.	Head Teacher		
Staff named as CCTV authorised users have received appropriate training and received a copy of the school's CCTV Policy	N/A – System does not record	N/A – System does not record	N/A – System does not record
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	N/A – System does not record	N/A – System does not record	N/A – System does not record
Staff and members of the school community will be consulted about the proposal to install CCTV equipment.	N/A	N/A	N/A
Cameras have been sited so that they provide clear images.	23/09/2026	R Clarke	23/09/2027
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	23/09/2026	R Clarke	23/09/2027
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	Not applicable as cameras do not record. However signs have been ordered should school decide that they would like the facility to record images		
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	N/A – System does not record	N/A – System does not record	N/A – System does not record
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.	N/A – System does not record	N/A – System does not record	N/A – System does not record
Except for law enforcement bodies, images will not be provided to third parties.	N/A – System does not record	N/A – System does not record	N/A – System does not record

The organisation knows how to respond to individuals making requests for copies of their own images.	Not applicable as the system does not record images		
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	23/09/2026	R Clarke	23/09/2027

Appendix B – CCTV Signage

It is a requirement under data protection legislation to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for enquiries

