

CCTV Policy

Keelham Primary School



Approved by: Full Governing Body

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1. Statement of intent

1.1 Purpose of CCTV

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
- Assist in the defence of any litigation proceedings

- Support the school's safeguarding responsibilities as set out in Keeping Children Safe in Education (2026)

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, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025.**

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.

Safeguarding Use

The CCTV system supports the school's safeguarding responsibilities as set out in Keeping Children Safe in Education (2026). Footage may be used to:

- Investigate safeguarding concerns
- Support behaviour management
- Protect staff from false allegations
- Provide evidence in disciplinary or child protection investigations

Any use of CCTV footage for safeguarding purposes will be handled in accordance with our Child Protection and Safeguarding Policy and will involve the Designated Safeguarding Lead.

For safeguarding-related enquiries about CCTV footage, please contact: safeguarding@keelham.bradford.sch.uk

2. Legal framework

2.1 Legislation

This policy is based on:

- The UK General Data Protection Regulation (UK GDPR)
- The Data (Use and Access) Act 2025
- The Data Protection Act 2018
- The Human Rights Act 1998
- The 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
- Keeping Children Safe in Education (2026)

2.2 Guidance

This policy also takes into account:

- ICO guidance on CCTV
- ICO CCTV code of practice
- Surveillance Camera Commissioner's code of practice

3. Responsibilities

3.1 The governing board

The governing board is responsible for:

- Ensuring that the school complies with all relevant legislation
- Ensuring that this policy, as written, does not discriminate on any grounds, including but not limited to ethnicity/national origin, culture, religion, gender, disability or sexual orientation
- Handling complaints regarding this policy, as outlined in the school's complaints policy

- Handling complaints regarding the school's CCTV system
- Ensuring that this policy is published and made available to staff, parents and pupils

3.2 The headteacher

The headteacher is responsible for:

- The day-to-day implementation and management of the school's CCTV policy
- Ensuring that staff are aware of the CCTV system and the reasons for its use
- Ensuring that the CCTV system is used in accordance with this policy
- Ensuring that the CCTV system is regularly maintained and serviced
- Ensuring that footage is only accessed by authorised personnel
- Ensuring that the school's CCTV system is registered with the Information Commissioner's Office (ICO)

3.3 The data protection officer (DPO)

The DPO is responsible for:

- Ensuring that the school complies with data protection legislation in relation to the CCTV system
- Advising the school on data protection issues relating to CCTV
- Monitoring compliance with this policy
- Dealing with subject access requests relating to CCTV footage
- Ensuring that Data Protection Impact Assessments are carried out and reviewed regularly
- Carrying out termly checks to determine whether footage is being stored accurately and being deleted after the retention period

3.4 The designated safeguarding lead (DSL)

The DSL is responsible for:

- Ensuring that CCTV footage is used appropriately in safeguarding investigations
- Liaising with the headteacher and DPO when CCTV footage is required for safeguarding purposes
- Ensuring that any use of CCTV footage in safeguarding matters complies with the Child Protection and Safeguarding Policy
- Maintaining confidentiality and data protection when handling CCTV footage related to safeguarding concerns
- Responding to safeguarding-related enquiries about CCTV footage sent to safeguarding@keelham.bradford.sch.uk

3.5 All staff

All staff are responsible for:

- Being aware of the school's CCTV system and the reasons for its use
 - Following this policy when accessing or requesting CCTV footage
 - Reporting any concerns about the CCTV system to the headteacher or DPO
 - Maintaining confidentiality when dealing with CCTV footage
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4. Siting the cameras

Cameras will be sited so that they:

- Only capture images that are relevant to the purposes for which they are installed
- Provide clear images to allow for effective identification of individuals
- Are positioned to avoid capturing images of private areas (such as neighbouring properties)
- Are clearly visible, with appropriate signage displayed

The school will ensure that CCTV cameras are not installed in areas where individuals have a heightened expectation of privacy, including:

- Toilets
- Changing rooms
- Staff rooms (unless there is a specific security concern and a DPIA has been completed)

A list of camera locations is provided in Appendix 1.

Before installing any new cameras, the school will:

- Conduct a Data Protection Impact Assessment (DPIA)
 - Consult with staff and, where appropriate, parents and pupils
 - Ensure that the installation is necessary and proportionate
 - Update the camera location list in Appendix 1
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5. Data Protection Impact Assessment (DPIA)

The school will conduct a DPIA before:

- Installing the CCTV system for the first time
- Making any significant changes to the CCTV system
- Installing cameras in new locations

The DPIA will assess:

- The necessity and proportionality of the CCTV system
- The risks to individuals' privacy
- Measures to mitigate those risks
- Whether the benefits of the CCTV system outweigh any negative impact on privacy

The DPIA will be reviewed annually, or whenever there are significant changes to the CCTV system.

The DPO will be responsible for conducting and reviewing the DPIA.

6. Covert monitoring

The school will not use covert monitoring (i.e., monitoring that is not obvious or signposted) unless:

- There are exceptional circumstances that justify it (e.g., investigating serious criminal activity)
- A DPIA has been completed
- Legal advice has been sought
- The monitoring is proportionate and necessary
- The monitoring is time-limited

Any covert monitoring will be conducted in accordance with the Regulation of Investigatory Powers Act 2000.

7. Security of the CCTV system

The school will ensure that the CCTV system is secure by:

- Restricting access to the CCTV control room and monitors to authorised personnel only
- Using password protection on all CCTV equipment
- Ensuring that all footage is encrypted
- Regularly updating software and security measures
- Maintaining a log of all access to CCTV footage
- Ensuring that any remote access to the system is secure and monitored

Only the following individuals will have access to the CCTV system:

- Headteacher

- Deputy Headteacher
- Site Manager
- Designated Safeguarding Lead
- Data Protection Officer
- Other staff members authorised by the headteacher for specific purposes

All individuals with access to the CCTV system will receive training on:

- Data protection principles
- How to handle subject access requests
- Security protocols
- When and how to share footage
- The school's CCTV policy

8. Storage of CCTV footage

In accordance with the Data (Use and Access) Act 2025, data must be deleted once it's no longer necessary for its original purpose. Footage will be retained for **30 days**.

This retention period has been determined as necessary and proportionate to achieve the stated aims of the CCTV system whilst minimising intrusion into individuals' privacy. The retention period is reviewed annually as part of our Data Protection Impact Assessment.

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, or where there is an ongoing safeguarding 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.

Records will be kept of:

- When footage is downloaded
- Who downloaded it
- The reason for downloading it
- How long it will be retained for
- When it is deleted

9. Viewing CCTV footage

9.1 General access

Access to CCTV footage will be restricted to authorised personnel only (as listed in section 7).

Footage will only be viewed:

- For the purposes outlined in section 1.1
- By authorised personnel
- In a secure location
- With a record kept of who viewed the footage, when, and why

9.2 Subject access requests

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

Upon receiving the request, the school will immediately issue a receipt and will then respond **within one calendar month (30 days)**. The school reserves the right to extend that deadline **by a further two months** where requests are complex or numerous, and will inform the requestor of any extension within one month of receipt of the request, giving reasons for the delay.

All staff have received training to recognise subject access requests (SARs). When a SAR is received staff 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.

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 or safeguarding concern.

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, still images may be released instead.

The school reserves the right to charge a reasonable fee to cover the administrative costs of complying with an 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.

9.3 Third-party access

The school may share CCTV footage with third parties where:

- It is necessary for the purposes outlined in section 1.1
- There is a legal obligation to do so
- It is in the public interest

Third parties who may request access to CCTV footage include:

- Police and law enforcement agencies
- Local authority safeguarding teams
- Legal representatives (in the context of litigation)
- Insurance companies (in the context of a claim)
- Health and Safety Executive

Before sharing footage with third parties, the school will:

- Verify the identity and authority of the person requesting the footage
- Ensure that the request is legitimate and proportionate
- Redact any footage that is not relevant to the request
- Keep a record of the disclosure

9.4 Privacy information

The school ensures that individuals are informed about the CCTV system through:

- Clear signage at all camera locations indicating:
 - That CCTV is in operation
 - The purpose of the CCTV
 - Who to contact for more information:
 - General enquiries: office@keelham.bradford.sch.uk
 - Safeguarding-related enquiries: safeguarding@keelham.bradford.sch.uk
- Information in our privacy notices for pupils, parents, staff and visitors
- Reference in the school prospectus and on the school website

All signage complies with the ICO's guidance on CCTV signage and includes the school's contact details.

The school's privacy notices explain:

- Why we use CCTV
 - The legal basis for processing CCTV footage
 - How long footage is retained
 - Who has access to footage
 - Individuals' rights regarding their personal data
 - How to make a subject access request
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10. Breaches

Any breach of this policy will be investigated by the headteacher and DPO.

Breaches may include:

- Unauthorised access to CCTV footage
- Failure to delete footage after the retention period
- Sharing footage inappropriately
- Using footage for purposes not outlined in this policy
- Failure to respond to subject access requests within the required timeframe

Depending on the severity of the breach, action may include:

- Disciplinary action against staff members
- Reporting the breach to the ICO (if it is a serious data breach)
- Informing affected individuals
- Reviewing and updating this policy and associated procedures

All data breaches will be recorded and reported in accordance with the school's data protection policy.

11. Complaints

Complaints about the school's CCTV system should be made in accordance with the school's complaints policy.

Complaints may relate to:

- The positioning of cameras
- The use of CCTV footage

- Access to footage
- Subject access requests
- Any other aspect of the CCTV system

The school will investigate all complaints and respond in a timely manner.

If individuals are not satisfied with the school's response, they may complain to the Information Commissioner's Office (ICO).

12. Monitoring and review

This policy will be reviewed annually by the headteacher and DPO.

The review will consider:

- Whether the CCTV system is still necessary and proportionate
- Whether the purposes outlined in section 1.1 are still relevant
- Whether there have been any changes to legislation or guidance
- Whether there have been any complaints or breaches
- Whether the DPIA needs to be updated
- Feedback from staff, parents, and pupils

Any changes to this policy will be approved by the governing board.

The school will also:

- Conduct an annual DPIA review
 - Carry out termly checks on footage storage and deletion (as outlined in section 8)
 - Maintain an access log for all CCTV footage viewing
 - Keep records of all subject access requests and third-party disclosures
 - Review CCTV signage annually to ensure it remains compliant and visible
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13. Appendix 1 - Location of cameras

The school has CCTV cameras installed in the following locations:

Camera Number	Location	Purpose	Date Installed
1	Front door	Monitor visitors, deter unauthorised access, and support safeguarding	Spring 2026
2	Main office corridor	Security, pupil safety and behaviour monitoring	Spring 2026
3	Back gate	Security and access control	Spring 2026
4	KS1 outdoor entrance	Security and access control	Spring 2026

This list will be updated whenever cameras are added, removed, or relocated.

A copy of this list is held by:

- The headteacher
- The site manager
- The DPO

14. Links to other policies

This policy should be read in conjunction with:

- **Child Protection and Safeguarding Policy**
- **Online Safety Policy**
- **Freedom of Information Policy**
- **School Site and Security Policy**
- **GDPR Data Protection Policy**
- **Privacy notices for parents, pupils, staff, governors, volunteers and applicants**
- **Behaviour Policy**
- **Complaints Policy**

END OF POLICY