



St Paul's Catholic Primary School

## CCTV Policy

September 2026

This policy will be reviewed on a bi-annual basis unless changes in legislation concerning GDPR occur prior to this date.

Approved by Governors: July 2026

Review Date: September 2028

## 1. Introduction

- 1.1 St Paul's Catholic Primary School uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitor the school buildings and grounds in order to provide a safe and secure environment for its pupils, staff and visitors, and to prevent loss or damage to school property.
- 1.2 The system comprises a number of fixed and dome cameras.
- 1.3 The system does not have sound recording capability.
- 1.4 The CCTV system is owned and operated by the school, the deployment of which is determined by the school's leadership team / Business Manager.
- 1.5 The CCTV is monitored centrally from the school office the hardware location station is also located in the school office. Access to the images is controlled by the Business Manager (Denise Perone), or in her absence, the school secretary (Maria Arango or Gina Haywood) and is password protected.
- 1.6 The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and members of the school community.
- 1.7 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images are covered by the Data Protection Act 1998. This policy outlines the school's use of CCTV and how it complies with the Act.
- 1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. Through this policy, all operators are made aware of their responsibilities in following the CCTV Code of Practice. The school's 'Data Controller' (Head Teacher - Katie Worton-Geer) will ensure that all employees are aware of the restrictions in relation to access to, and disclosure of, recorded images by publication of this policy. Data Protection Act 1998 is due to be replaced with the GDPR in May 2018]

## 2 Statement of Intent

- 2.1 The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:

<https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

- 2.2 CCTV warning signs are clearly and prominently placed at the main external entrance to the school, including further signage in other outdoor areas in close proximity to camera positions. Signs will contain details of the purpose for using CCTV (see appendix B). In areas where CCTV is used, the school will ensure prominent signs placed within the controlled area.

- 2.3 The original planning, design and installation of CCTV equipment endeavored to ensure that the scheme will deliver 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.

### **3 Siting the Cameras**

- 3.1 Cameras are sited so that 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 the Data Protection Act/GDPR.
- 3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which includes outdoor areas.
- 3.3 Members of staff will have access to details of where CCTV cameras are situated.

### **4 Covert Monitoring**

- 4.1 It is not the school's policy to conduct 'Covert Monitoring' unless there are 'exceptional reasons' for doing so.
- 4.2 The school may, in exceptional circumstances, determine a sound reason to 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.
- 4.3 In these circumstances authorisation must be obtained from a member of the senior leadership team and the school's 'Data Controller' advised before any commencement of such covert monitoring.
- 4.4 Covert monitoring must cease following completion of an investigation.
- 4.5 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles, changing areas etc.

### **5 Storage and Retention of CCTV images**

- 5.1 Recorded data will not be retained for longer than is necessary. 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.
- 5.2 All retained data will be stored securely at all times and permanently deleted as appropriate / required.

### **6 Access to CCTV images**

- 6.1 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available

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

- 7.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act/GDPR.
- 7.2 All requests should be made in writing to the Headteacher. 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.
- 7.3 The school will respond to requests within 40 calendar days of receiving the written request and any fee. This is as per the ICO CCTV Code of Practice.
- 7.4 A fee of £10 may be charged per request. This is as per the ICO CCTV Code of Practice.
- 7.5 The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

## **8 Access to and Disclosure of Images to Third Parties**

- 8.1 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).
- 8.2 Requests for images / data should be made in writing to the Head Teacher.
- 8.3 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 Complaints**

- 9.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Head Teacher in the first instance.

## **Further Information**

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

CCTV Code of Practice Revised Edition 2017 (published by the Information Commissioners Office)  
Version 1.2 [www.ico.org.uk](http://www.ico.org.uk)

Regulation of Investigatory Powers Act (RIPA) 2000 Data Protection Act 1998  
GDPR (wef 25 May 2018)

## **Appendix A – Checklist**

This CCTC system and the images produced by it are controlled by the Business Manager who is responsible for how the system is used under direction from the schools 'Data Controller'. The school notifies the Information Commissioner about the CCTV system, including any modifications of use and /or its purpose (which is a legal requirement of the current Data Protection Policy Act 1998)

St Pauls Catholic Primary 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 the school community. It will not be used for other purposes. The school will conduct regular reviews of our use of CCTV.

|                                                                                                                                                                                                                            | Checked<br>Date if appropriate | By                           | Date of Next<br>Review |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|------------------------------|------------------------|
| Notification has been submitted to the Information Commissioner and the next renewal date recorded.                                                                                                                        | Yes                            | Denise Perone                |                        |
| There is a named individual who is responsible for the operation of the system.                                                                                                                                            | Yes                            | Paul Burns                   |                        |
| A system has 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.                       | Yes                            | Denise Perone/<br>Paul Burns |                        |
| Staff and members of the school community will be consulted about any proposal to install/amend CCTV equipment or its use as appropriate.                                                                                  | Yes                            | Katie Worton-Geer            |                        |
| Camera's have been sited so that they provide clear images                                                                                                                                                                 | Yes                            | Denise Perone/<br>Paul Burns |                        |
| Camera's have been positioned to avoid capturing the images of persons not visiting the premises.                                                                                                                          | Yes                            | Denise Perone/<br>Paul Burns |                        |
| 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)                                                          | Yes                            | Paul Burns                   |                        |
| Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.                                                                                               | Yes                            | Denise Perone/<br>Paul Burns |                        |
| Recorded images will only be retained long enough for any incident to come to light (eg for a theft to be noticed) and the incident to be investigated.                                                                    | Yes                            | Denise Perone/<br>Paul Burns |                        |
| Except for the law enforcement bodies, images will not be provided to third parties.                                                                                                                                       | Yes                            | Katie Worton-Geer            |                        |
| The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the data controller knows to seek advice from the information commissioner as soon as such request is made. | Yes                            | Katie Worton-Geer            |                        |
| Regular checks are carried out to ensure the system is working properly and produces high quality images.                                                                                                                  | Yes                            | Paul Burns                   |                        |

## Appendix B – CCTV Signage

It is a requirement of the Data Protection Act 1998 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 any enquiries

