LIGHTHOUSE SCHOOLS PARTNERSHIP

CCTV Policy

Non-Statutory

Policy approved by Trust Executive Team	
Signed:	Date: 3 February 2025
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Document History

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This policy applies to all schools, with CCTV, within the Lighthouse Schools Partnership.

CCTV Policy

Non-Statutory

1.0 Background

1.1 Easton CE Primary school uses closed circuit television (CCTV) images for the prevention,
identification and reduction of crime and to 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.

1.2 CCTV surveillance at the School is intended for the purposes of:

- protecting the school buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, pupils and visitors;
- preventing bullying;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the Police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and ensuring that the school
- rules are respected so that the school can be properly managed.

1.3 The system comprises 45 cameras in fixed locations.

1.4 The CCTV system is owned and operated by the school and the deployment of which is determined by the school's leadership team.

1.5 The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act. This policy outlines the school's use of CCTV and how it complies with the Act.

1.6 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 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.

1.7 The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

1.8 The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance. The Surveillance Camera Commissioner Code of Practice can be found here.

1.9 CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including Dignity at Work Policy, Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other educational and related legislation.

2.0 Justification for Use of CCTV

2.1 The use of CCTV to control the perimeter of the school buildings for security purposes has been deemed to be justified by the leadership team/governors. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation or of antisocial behaviour.

2.2 CCTV systems will not be used to monitor normal teacher/student classroom activity in school.

3.0 Data Protection Impact Assessments

3.1 Where new CCTV systems or cameras are to be installed, Timothy Clifford will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This may involve the need for consultation with staff, parents and local residents.

3.2 Where existing CCTV systems are in operation as of May 2018, the school will endeavour to carry out a full Data Protection Impact Assessment on any upgrade or replacement of the system or within a 3 year period from the date of the implementation of GDPR, whichever is sooner.

4.0 Location of Cameras

4.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated.

At Easton CE Primary the CCTV cameras are sited at, see appendix A.

4.2 The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

4.3 Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. Easton CE Primary has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.

4.4 Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

4.5 CCTV Video Monitoring and Recording of Public Areas may include the following:

- **Protection of school buildings and property:** The building's perimeter, entrances and exits,lobbies and corridors, special storage areas, office locations, receiving areas for goods/services
- **Monitoring of Access Control Systems:** Monitor and record restricted access areas at entrances to buildings and other areas
- **Verification of Security Alarms:** Intrusion alarms, exit door controls, external alarms
- **Criminal Investigations (carried out by police):** Robbery, burglary and theft surveillance

5.0 Covert Surveillance

5.1 Easton CE Primary school will not engage in covert surveillance.

6.0 Notification

6.1 A copy of this CCTV Policy will be provided on request to staff, students, parents and visitors to the school and will be made available on the school website.

6.2 The location of CCTV cameras will also be indicated and adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation.

6.3 Adequate signage will also be prominently displayed at the entrances to Easton CE Primary school property. Signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.
Appropriate locations for signage will include:

- at entrances to premises i.e. external doors, school gates
- reception area
- at or close to each internal camera

7.0 Storage and Retention

7.1 The images captured by the CCTV system will be retained for a maximum of 22 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.
After 22 days the records will be automatically deleted.

7.2 The images/recordings will be stored in a secure environment with a log of access kept.

7.3 Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Headteacher. The Headteacher may delegate the administration of the CCTV System to another staff member.

7.4 In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

8.0 Access

8.1 Recorded footage and the monitoring equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel. A log of access to footage will be maintained.

8.2 Access to the CCTV system and stored images will be restricted to Ite Manager, Headteacher, SLT, Estates & Facilities Hub Lead and Office Manager

8.3 When accessing images two authorised members of staff must be present. A written record of access will be made. Records of access will be kept.

8.4 A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

8.5 Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

8.6 In relevant circumstances, CCTV footage may be accessed:

- By the police where Easton CE Primary (or its agents) are required by law to make a
  report regarding the commission of a suspected crime; or
- Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on Easton CE Primary property, or
- To the HSE and/or any other statutory body charged with child safeguarding; or
- To individuals (or their legal representatives) subject to a court order.
- To the local authority, or any other statutory body charged with child safeguarding; or
- To assist the Headteacher in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- To data subjects (or their legal representatives), in response to a Subject Access Request (SAR)
- To the school's insurance company where the insurance company requires the same in order to pursue a claim for damage done to the insured property.

9.0 Subject Access Requests (SAR)

9.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

9.2 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.

9.3 The school will respond to requests within one calendar month of receiving the request in line with the school's right of access policy.

9.4 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.

9.5 A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

9.6 In giving a person a copy of their data, the school provide a still/series of still pictures, or on digital media. However, other images of other individuals will be obscured before the data is released.

9.7 Where footage contains images relating to 3rd parties, the school will take appropriate steps to mask and protect the identities of those individuals.

10.0 Complaints

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

10.2
School Contact Details: school@eceps.org.uk - 01173773070
DPO Contact Details: I-west@BATHNES.GOV.UK
ICO Contact Details: 0303 123 1113

11.0 Staff Training

11.1 Staff authorised to access the CCTV system will be trained to comply with this policy. Staff will understand that all information relating to the CCTV images must be handled securely.

11.2 Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.

11.3 Staff misuse of surveillance system information will lead to disciplinary proceedings.

12.0 Responsibilities

12.1 The Headteacher (or nominated deputy) will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Easton CE Primary
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Easton CE Primary
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at Easton CE Primary is consistent with the highest
  standards and protections
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access (e.g. an access log) of any material recorded or stored in the system

- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place
  Co-operate with the Health & Safety Officer of Easton CE Primary in reporting on the
  CCTV system in operation in the school
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that monitoring footage is stored in a secure place with access by authorised personnel only.
- Ensure that images are stored for a period not longer than 30 days and are then deleted unless required as part of a criminal investigation or court proceedings (criminal or civil).
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

Appendix A

Fixed Camera locations at Easton CE Primary School

Camera Number	Camera Location & Description	TYPE	System
A-01	Front Carpark - Main Vehicle Gate	Analogue	School
A-02	Front Carpark - Looking Right	Analogue	School
A-03	Front Carpark - Looking Left	To be installed	
A-04	Front Carpark - Bin yard	To be installed	
A-05	Front door of school - Main Entrance - External	Analogue	School
B-01	Front of school - Main Reception - Internal	Analogue	School
B-02	Front of school - Reception - Holding Pen - Internal	Analogue	School
C-01	Nursery Area - Nursery Conservatory Doors	Analogue	School
C-02	Nursery Area - Nursery Garden	Analogue	School
D-01	Clifton Place Gate	To be installed	
D-02	Clifton Place Pathway / Staff Carpark Vechile Gate	To be installed	
E-01	Staff Carpark / Walkway - Looking Left	Analogue	School
E-02	Staff Carpark Pedistrian Gate - Looking Right	Analogue	School
F-01	Reception Decking Looking Right	Analogue	School
G-01	Year 1 Playground & Muga - Looking Left	Analogue	School
G-02	Year 1 Playground - Looking Right	Analogue	School
H-01	Playground - Looking Down Towards Main Building	Analogue	School
H-02	Playground - Looking Up Towards Playing Field	Analogue	School
H-03	Playing Field - Looking Left	Analogue	School
H-04	Playing Field - Looking Right	Analogue	School
I-01	Rear of KS2 Building - Looking towards Sprinkler House	Analogue	School
I-02	End of KS2 Building - Looking towards Sports Centre Gate	Analogue	School
J-01	Year 3 Classroom - Looking Inside Sports Centre Gate	Analogue	School
J-02	Year 2 Classroom Exit - Looking at Sports Centre Gate & KS2	Analogue	School
J-03	Year 3 Classroom - Looking at Year 2&3 Exit on Lower walkway	Analogue	School
J-04	KS2 Entrance - Looking at Upper & lower Walkway	Analogue	School
K-01	Link Walkway Under the Canopy - Looking Down the Ramp.	Analogue	School
K-02	Looking at the Courtyard - Back of Central Office.	Analogue	School
L-01	KS2 Building - Looking at Internal Front Entrance.	Analogue	School
L-02	KS2 Building - Looking at Internal Rear Entrance.	Analogue	School

M-01	Meadow - Playground - At the Link Gate - Looking Right at Exit Gate	Digital	Meadow
M-02	Meadow - Playground - On the corner - Looking Left at Exit Gate	Analogue	School
M-03	Meadow - Playground - On the corner - Looking Right at Wendy House	Digital	Meadow
M-04	Meadow - Playground - On the corner - Looking Right at Wendy House	Analogue	School
M-05	Meadow - Playground - On the corner - Looking Right at ECFC Link Gate	Digital	Meadow
M-06	Meadow - Playground - On the corner - Looking at ECFC Fence & Wendy House	Digital	Meadow
N-01	Meadow - Breakout Area - Adjacent to School Link Door	Digital	Meadow
N-02	Meadow - Breakout Area - View from Top of the Steps	Digital	Meadow
N-03	Removed - Meadow - Office	Digital	Meadow
N-04	Meadow - Internal Leading to toilets & Playground.	Digital	Meadow
O-01	Removed - Meadow - Grasshopper Class	Digital	Meadow
O-02	Meadow - Laybird Class	Digital	Meadow
O-03	Meadow - Busy Bee Class	Digital	Meadow
O-04	Meadow - Butterfly Class - Facing In	Digital	Meadow
O-05	Meadow - Butterfly Class - Facing Out	Digital	Meadow
Z-01	Stanley St - Sports Centre Gate.	Digital	Meadow
Z-02	Stanley St - Fence Mid Point - Looking Right.	Digital	Meadow
Z-03	Stanley St - Meadow Gate - Looking Left.	Digital	Meadow
Z-04	Stanley St - Meadow Gate - Looking Right.	Digital	Meadow