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FAMILY OF SCHOOLS

Palfrey Junior School ©

CCTV Policy

(General Data Protection Regulation - GDPR)

2026 – 2027

(Updated September 2025)

INTRODUCTION

Palfrey Junior School uses CCTV images to reduce crime and monitor the school buildings and grounds to provide a safe and secure environment for pupils, staff and visitors. It is also used to prevent the loss or damage to school property.

This Policy outlines the activities of those involved in the operation and installation of a school CCTV system. The Policy will follow the guidelines published by the Home Office and the Information Commissioners Office (ICO) on the use of CCTV in public places.

The System

The system comprises of a number of fixed and dome cameras. The system does not have a sound recording capability on the external cameras. The internal cameras that are situated in the main office/reception and canteen area does have sound recording facility.

Maintenance checks

Cameras will be checked daily to ensure that they are operational.

Recorders will be checked once a month to ensure that they are recording and it is possible to down load images.

Camera fixings will be checked to ensure safety and security, during planned maintenance e.g. cleaning cameras

Repairs will be made to the system within two weeks if practical, dependent upon cost and CCTV review

Maintenance and Repairs are contracted to: Connaught Converged Solutions, Systems House, The Courtyard, Reddicap Trading Estate, Sutton Coldfield, B75 7BU

Camera images can be recorded and displayed on the Head teacher's office computer and laptop, Admin office computer and the Server Room computer. No other staff have access to the CCTV Camera footage. (Additional viewing and monitoring is enabled from the Head teacher in instances that may occur out of hours eg: Alarm activation)

The recorded images are stored on a hard drive, which is automatically overwritten after 4 weeks.

GDPR

The system shall be used in accordance to all relevant laws and guidelines, including the GDPR 2018, The Human Rights Act 1998 and if appropriate Regulation of Investigatory Powers Act 2000.

Signage

Signs are displayed at entrance points and within the area covered by the system to inform staff, students and the public.

Purpose of CCTV

The system is intended to provide and promote a safe secure environment for pupils and for those who work or use the facilities of the school; and to protect the school buildings and resources. It is hoped that it will also reduce the fear of crime and anti-social behaviour within the location.

The system is intended to view and monitor activity in the immediate area of the school and school grounds only.

It shall be used for the purpose of:

- Playground / Play equipment monitoring
- Safeguarding
- Site Security
- Health and Safety of pupils, staff and public
- Preventing and deterring crime & aggressive or antisocial behaviour
- Pupil, staff and public safety,
- Supporting where appropriate staff & student discipline issues
- Facilities management.

It will achieve this by:

- enabling the viewing of live footage
- providing evidential quality images of reported incidents or allegations
- assisting the responsible authorities in the investigation of policies, procedures, crime & disorder.

Siting the Cameras

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 GDPR. The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

CCTV will not be used in classrooms but may be used in areas within school that have been identified by staff and pupils as not being easily monitored.

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. This is included in the staff handbook.

Covert Monitoring

The school may in exceptional circumstances set up covert monitoring. For example:

- 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;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

Covert monitoring must cease following completion of an investigation. 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.

Management of System

The overall management of the system is the responsibility of the Governing Body of the school, who have appointed the Head teacher and the Finance & Facilities Manager for the function of Data Controllers.

The system will be managed in accordance will all relevant legislation.

The day-to-day management and security of the control equipment and data is the responsibility of the Finance & Facilities Manager who will follow the data protection guidelines with regard to access to the 'Server Room' by visitors.

Incident Reporting

If an incident or allegation is received by the school then CCTV can be used to recall footage for viewing. In these incidents footage will be viewed by the Head teacher and the Finance and Facility Manager together in the first instance to ascertain whether a breach of any School Policy or Procedures has occurred. This will be logged on the incident register (Appendix A) and shall be stored in a secure lockable place, and maintained by the Head teacher.

If a breach has occurred then the necessary action will be taken in line with School Policy and Procedures and investigated by the relevant line manager, relevant authority or Police/Investigator.

The register will include the following:

- Who carried out search and/or copied of the event.
- Persons present for the viewing
- Date, start and end time of the incident.
- Date and time of the review/copy.
- Reason for viewing the footage (eg damage caused/complaint)
- If applicable under "Action" include the details of the officer or authorised agent, collecting the copied media and their contact details.

Criminal & Suspicious Activity

During monitoring, if criminal or suspicious activity of a serious nature is observed then the school should immediately inform the Police. Once an incident is reported to the Police it will be dealt with in accordance with Police procedure.

Storage of Recorded Images and their viewing

- The storage space shall be dust and moisture proof.
- Viewing or copying will be carried out only if it would assist the school in supporting procedures for which the Head teacher is responsible or to address one of the issues stated in the 'purpose of CCTV'.
- Recorded images are not to be taken away from the school premises under any circumstances unless deemed necessary by the Police/Investigators/relevant authority for criminal activities
- A record of viewing and copying must be noted in the register.

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the Freedom of Information Act. Please see the Privacy Notice for Parents & Pupils. CCTV footage is only retained for 28 calendar days.

Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified (e.g: date, time and location). The requests will be dealt with in line with the school GDPR Policy. 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. Exemptions are set out in of the GDPR Policy. The school will respond to requests within 20 calendar days of receiving the written request.

Staff Training

The Head teacher shall ensure that all appropriate staff are trained on the use of the equipment and are familiar with their data protection responsibilities as detailed in the ICO's CCTV code of practice 2008

Complaints

Any complaints about the schools CCTV system should be addressed to the Head teacher. Complaints will be investigated in accordance with this Policy.

Breaches of the Policy

Misuse of recorded imagery or the system will be a disciplinary offence.
Any breaches of this policy by school staff will be individually investigated by the Head teacher and appropriate disciplinary actions taken.

Disciplinary action can also include prosecution under the data protection act and criminal proceedings.

Statement of Intent

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. The Code of Practice is published at:

http://ico.org.uk/for_organisations/data_protection/topic_guides/~/media/documents/library/Data_Protection/Detailed_specialist_guides/cctv-code-of-practice.pdf

Appendix A

REGISTER OF CCTV FOOTAGE INCIDENTS AND REVIEWS

Date of review	Reviewers name & signature	Others present at the viewing	Date and time of the incident reviewed	Reason for the Viewing	Details of action taken

Signed: **Print:** Mr. **James** **Pearce** **Date:7th September 2020** **Head teacher**	**Signed:** **Print:** **Mrs.** **Janet Jeffries** **Date: 7th September 2020** **Chair of Governors**