



'Spurring each other on with love'

CCTV Policy 2026-2027

(ANNUAL)

Policy / Version Date	Summary of change	Governor adoption Date	Signed by the Chair	Next Review Date
1	New policy from Firebird in line with GDPR regulations	September 2019		Spring 2020
2	No changes made	19 th March 2020		Spring 2021
3	Updates suggested by Amber Badley (DPO)	18 th March 2021		Spring 2022
4	Model policy used (Firebird) no changes made	17 th March 2022		Spring 2023
5	Model policy from Devon Education Service GDPR advisor	16 th March 2023		Spring 2024
6	Reviewed, no changes made	24 th January 2024		Spring 2025
7	Reviewed, no changes made	11 th March 2025		Spring 2026
8	Model policy used from Devon Education Service GDPR advisor	19 th March 2026		Spring 2027

If you require help with the interpretation of this policy, please email the Data Protection Officer at

admin@bickleighdown.devon.sch.uk

1 CCTV Policy Statement

1.1 Bickleigh Down CE (Aided) Primary School uses Closed Circuit Television (“CCTV”) within the premises of the school. The purpose of this policy is to outline the position of the school as to the management, operation and use of the onsite CCTV.

1.2 This policy applies to all members of staff, visitors to the school premises and all other persons whose images may be captured by the CCTV system.

1.3 This policy takes account of all applicable legislation and guidance, including:

1.3.1 [UK General Data Protection Regulation](#)

1.3.2 [Data Protection Act 2018](#) (together the Data Protection Legislation)

1.3.3 [CCTV and Video Surveillance Guidance](#) produced by the Information Commissioner’s Office (ICO)

1.3.4 [Surveillance Camera Code of Practice](#) – UK Government

1.3.5 [Human Rights Act 1998](#)

1.3.6 [Regulation of Investigatory Powers Act 2000 \(RIPA\)](#)

1.3.7 [Protection of Freedoms Act 2012](#)

1.4 This policy sets out the position of the school in relation to its use of CCTV.

2 Purpose of CCTV

2.1 The school uses CCTV for the following purposes:

2.1.1 To provide a safe and secure environment for pupils, staff and visitors

2.1.2 To prevent the loss of or damage to school buildings and/or assets

2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

2.1.4 To increase the perception of safety and reduce the fear of crime.

3 Description of system

3.1 The system is Hik Vision. All images are stored on hard disk drives. The cameras have a fixed field of vision. The system is serviced and maintained by Capstan Services.

4 Siting of Cameras

4.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.

4.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The school will make all reasonable efforts to ensure that areas outside of the school premises are not recorded.

4.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.

5 Privacy by Design - Data Protection Impact Assessment (DPIA)

5.1 Prior to the installation of any new CCTV camera, or system, the school will:

5.1.1 consider whether it can fulfil its requirements through a less privacy-intrusive system that does not include surveillance and recording

5.1.2 conduct a DPIA to ensure that appropriate due diligence on the proposed installation is carried out to assess security risks and how rights of individuals will be upheld, in line with the legislation and ICO guidance.

5.1.3 adopt a 'privacy by design' approach, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

6 Management and Access

6.1 The CCTV system will be managed by the School Business Manager

6.2 On a day to day basis the CCTV system will be operated by the School Business Manager or the Deputy Headteacher.

6.3 The installed surveillance systems are a closed digital system and will not record audio by default, as audio recording may be considered an excessive intrusion of privacy. If audio recording is possible, this option will be turned off except for in the Reception Area where Audio is enabled for the purposes of monitoring verbal abuse.

6.4 Although the installed surveillance systems have been designed for maximum effectiveness and efficiency, the school cannot guarantee that every incident will be detected or covered and 'blind spots' may exist.

6.5 The viewing of live CCTV images will be restricted to the School Business Manager, Headteacher and Deputy Headteacher.

6.6 Recorded images which are stored by the CCTV system will be restricted to access by the School Business Manager, Headteacher and Deputy Headteacher. On occasions teachers or support staff may be given access to aid with identification.

6.7 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.

6.8 The CCTV system is checked weekly by the School Business Manager to check correct operation.

7 CCTV Signage

7.1 It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school will 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 purposes of using CCTV.
- The name of the school.
- The contact telephone number or address for enquiries.

8 Processing, Storage and Retention of Images

8.1 Any images recorded by the CCTV system will be:

8.1.1 processed lawfully, fairly and in a transparent manner in relation to individuals

8.1.2 collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes

8.1.3 Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed

8.1.4 Accurate and, where necessary, kept up to date

8.1.5 Retained only for as long as is necessary for the purposes for which the data were originally recorded.

8.1.6 processed in a manner that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

8.2 Recorded images are stored for a period of three weeks unless there is a specific purpose for which they are retained for a longer period.

8.3 The school will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

8.3.1 CCTV recording systems being located in restricted access areas;

8.3.2 Restriction of the ability to make copies to specified members of staff

8.4 A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by the school.

9 Disclosure of Images to Data Subjects

9.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection legislation and has a right to request access to those images.

9.2 Any individual who requests access to images of themselves or those for which they have parental responsibility will be considered to have made a Data Subject Access Request (SAR) which will be processed in accordance with our Subject Access Request Policy.

9.3 When such a request is made the Headteacher will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

9.4 If the footage contains only the individual making the request then, in most circumstances, the individual may be permitted to view the footage (unless this may jeopardise an ongoing investigation). This must be strictly limited to that footage which contains only images of the individual making the request so as not to prejudice the legal rights of others. The Headteacher must take appropriate measures to ensure that the footage is restricted in this way.

9.5 If the footage contains images of other individuals then the school must consider whether:

9.5.1 The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;

9.5.2 The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or

9.5.3 If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

9.6 A record must be kept, and held securely, of all disclosures which sets out:

9.6.1 When the request was made;

9.6.2 The process followed by the Headteacher in determining whether the images contained third parties;

9.6.3 The considerations as to whether to allow access to those images;

9.6.4 The individuals that were permitted to view the images and when; and

9.6.5 Whether a copy of the images was provided, and if so to whom, when and in what format.

10 Disclosure of Images to Third Parties

10.1 The school will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection legislation.

10.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

10.3 If a request is received from a law enforcement agency for disclosure of CCTV images then the Headteacher must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency describing the reason they want the CCTV images and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third-party images.

10.4 The information above must be recorded in relation to any disclosure.

10.5 Consideration will always be given to the safeguarding and best interest of pupils. All disclosures and the reasons for release should be recorded.

10.6 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. This will be communicated to staff via the school's privacy notices.

10.7 If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

11 Review of Policy and CCTV System

11.1 This policy will be reviewed regularly and, in particular, when there are any changes made to associated legislation.

11.2 The CCTV system and any DPIA's relating to it will be reviewed regularly.

12 Misuse of CCTV systems

12.1 The misuse of CCTV system could constitute a criminal offence.

12.2 Any member of staff who breaches this policy may be subject to disciplinary action.

13 Complaints relating to this policy

12.1 Any complaints relating to this policy or to the CCTV system operated by the school should be made in writing to the Headteacher.