RAMSDEN PRIMARY SCHOOL

CCTV POLICY

UK GDPR and Data Protection Act 2018

Compiled by	Headteacher	September 2026
Approved By	Chair of Governors  September 2026	Headteacher  September 2026
To be reviewed		Autumn Term 2027

Contents

1. Introduction

2. Objectives of the CCTV System

3. Statement of Intent

4. Operation of the System

5. Storing, Accessing and Viewing CCTV Images

6. Requests to View or Obtain Copies of Images

7. Disclosure to Police and Other External Agencies

8. Breaches of the Policy and Security Incidents

9. Assessment and Review of the CCTV System

10. Complaints

11. Responsibilities

12. Equality, Inclusion and Safeguarding

1. Introduction

1.1 The purpose of this policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system at Ramsden Primary School. The policy is intended to ensure that CCTV is used lawfully, proportionately, securely and responsibly, with due regard to the privacy and rights of pupils, staff, parents, visitors and other individuals who may be recorded.

1.2 The policy is informed by the principles of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the relevant guidance and codes of practice issued by the Information Commissioner's Office (ICO).

1.3 CCTV forms one part of the school's wider approach to safeguarding, site security, the protection of pupils and staff, and the management of the school environment. It does not replace appropriate supervision, safeguarding procedures or other security measures.

2. Objectives of the CCTV System

2.1 To help ensure the safety and wellbeing of pupils, staff, parents, contractors and visitors.

2.2 To support the school's safeguarding responsibilities and assist in responding to incidents involving the safety or welfare of pupils.

2.3 To protect the school buildings, grounds, equipment and other assets.

2.4 To deter and, where appropriate, assist in the detection of crime, trespass, vandalism and other unlawful or seriously inappropriate activity.

2.5 To assist the police or other lawful authorities with the investigation of specific incidents where disclosure is justified.

2.6 To assist the school in establishing facts about significant incidents occurring within areas covered by CCTV.

2.7 To support the effective management and security of the school site.

2.8 CCTV will not be used for generalised or routine surveillance of pupils or staff where there is no legitimate purpose for doing so.

3. Statement of Intent

3.1 Ramsden Primary School will treat CCTV images as personal data where individuals can be identified. The school will process and protect CCTV information in accordance with applicable data protection legislation and the school's wider data protection arrangements.

3.2 CCTV will only be used for clearly defined and legitimate purposes. The school will seek to ensure that the use of CCTV is necessary and proportionate to those purposes.

3.3 Cameras will be positioned so that they provide effective coverage of relevant school areas while minimising unnecessary intrusion into private areas.

3.4 The school will take reasonable steps to avoid capturing images of neighbouring homes, gardens or other areas outside the school's control unless this is unavoidable and justified by the purpose of the system.

3.5 CCTV images and knowledge obtained through the system will not be used for commercial, entertainment or media purposes. Images will only be disclosed or copied where there is a lawful and legitimate reason to do so.

3.6 CCTV is not guaranteed to capture every incident. Cameras may have limitations arising from lighting, weather, positioning, obstructions, technical faults or the nature of an incident.

3.7 Appropriate CCTV warning signs will be displayed so that individuals are made aware that CCTV is operating.

3.8 The school will maintain appropriate records about the operation and management of the CCTV system, including access, incidents, disclosures and relevant retention decisions.

4. Operation of the System

4.1 Overall strategic oversight of CCTV will sit with the Headteacher, working with the school's Data Protection Officer (DPO) / Data Protection Lead as appropriate.

4.2 The Headteacher is responsible for ensuring that the CCTV system is operated consistently with this policy and that appropriate arrangements are in place for day-to-day management, security, maintenance and access.

4.3 The DPO is responsible for providing advice on data protection compliance, responding to relevant data protection issues and supporting periodic review and audit of the CCTV arrangements.

4.4 The CCTV system will operate in accordance with the school's technical configuration and the areas for which cameras have been installed.

4.5 Access to live or recorded CCTV will be restricted to authorised individuals whose duties require such access.

4.6 CCTV equipment, passwords, recording systems and exported footage will be protected against unauthorised access, alteration, loss or disclosure.

4.7 Any technical fault or security concern relating to the CCTV system should be reported promptly to the Headteacher or the person responsible for the system.

5. Storing, Accessing and Viewing CCTV Images

5.1 Recorded material will be stored securely and in a manner that maintains the integrity and confidentiality of the information.

5.2 The normal retention period for CCTV recordings at Ramsden Primary School will be 15 days, after which recordings will be automatically deleted or overwritten, unless there is a lawful reason to retain particular footage for longer.

5.3 Where footage is required for safeguarding, disciplinary, insurance, legal, police or other legitimate investigative purposes, the relevant footage may be isolated and retained for as long as is reasonably necessary for that purpose. The reason for extended retention should be recorded.

5.4 Where footage is retained as evidence, the school will maintain an appropriate audit trail showing who accessed, copied, transferred or otherwise handled the footage.

5.5 Recorded images will normally be viewed only by the Headteacher, DPO/Data Protection Lead, designated members of the Senior Leadership Team, or other specifically authorised staff.

5.6 Viewing of footage should take place in a secure location and in a manner that prevents unauthorised individuals from seeing or obtaining access to the images.

5.7 Staff must not use personal mobile phones, personal recording equipment or unauthorised devices to photograph, film or copy CCTV footage.

5.8 Where CCTV covers an area of particular sensitivity, access to recorded images will be especially restricted and footage will only be viewed where there is a clear and legitimate reason to do so.

6. Requests to View or Obtain Copies of Images

6.1 Requests for access to CCTV images by an individual will be considered in accordance with the school's data protection and Subject Access Request procedures.

6.2 Requests should be referred to the DPO/Data Protection Lead before any footage is disclosed.

6.3 The school will consider whether the requester is entitled to receive the requested information and whether disclosure would adversely affect the rights and freedoms of other individuals shown in the footage.

6.4 Where appropriate, images of other individuals may need to be obscured or otherwise protected before footage is disclosed.

6.5 The school will take reasonable steps to verify the identity of an individual making a request before providing personal data.

6.6 Requests will be handled within the applicable statutory timescales and in accordance with the school's data protection procedures.

7. Disclosure to Police and Other External Agencies

7.1 Requests for CCTV footage from the police, social care, legal representatives, insurers or other external organisations must be referred to the Headteacher and/or DPO/Data Protection Lead.

7.2 Footage will only be disclosed where the school is satisfied that there is an appropriate lawful basis or other legal justification for disclosure.

7.3 Where footage is disclosed, the school should record what was disclosed, to whom, when, why and by whom the disclosure was authorised.

7.4 Where necessary, identifying features of individuals who are not relevant to the request may be obscured or other measures taken to protect their privacy.

7.5 Original recordings should be preserved where they may be required as evidence. Copies provided for investigative purposes should be handled securely.

8. Breaches of the Policy and Security Incidents

8.1 Any suspected unauthorised access, copying, disclosure, alteration, loss or destruction of CCTV footage must be reported immediately to the Headteacher and DPO/Data Protection Lead.

8.2 A personal data breach involving CCTV will be assessed and managed in accordance with the school's data breach procedures.

8.3 Serious or deliberate breaches of this policy by staff may be dealt with under the school's disciplinary procedures.

8.4 Where a breach may constitute a criminal offence or safeguarding concern, the school will consider whether referral to the police, children's services or another appropriate authority is required.

9. Assessment and Review of the CCTV System

9.1 The school will periodically review the operation and effectiveness of the CCTV system.

9.2 Reviews will consider whether cameras remain necessary and proportionate, whether their positioning remains appropriate, whether warning signs remain adequate, whether access controls are effective and whether retention arrangements remain appropriate.

9.3 The school may carry out audits or spot checks of CCTV access and operating arrangements.

9.4 Where the purposes or scope of the CCTV system change significantly, the school will consider whether a data protection impact assessment or other formal review is required.

9.5 This policy will normally be reviewed annually, or sooner where there is a significant change in legislation, guidance, technology, school circumstances or the CCTV system.

10. Complaints

10.1 Any complaint about the operation or use of the school's CCTV system should, in the first instance, be made to the Headteacher or DPO/Data Protection Lead.

10.2 Complaints will be investigated in accordance with the school's Complaints Policy and relevant data protection procedures.

10.3 Individuals who remain dissatisfied with the school's handling of a data protection matter may have a right to complain to the Information Commissioner's Office, subject to the circumstances of the case.

11. Responsibilities

Role	Key responsibility
Headteacher	Overall operational responsibility for the CCTV system, ensuring it is used consistently with this policy and that appropriate access, security and maintenance arrangements are in place.
DPO / Data Protection Lead	Advice on data protection compliance; oversight of requests, disclosures, breaches and audits; advice on retention and lawful use.
Senior Leadership Team / authorised staff	Access and view CCTV only when authorised and only for legitimate school purposes; maintain confidentiality and follow this policy.
All staff	Do not access, record, share or discuss CCTV footage unless authorised. Report suspected misuse or security incidents immediately.
Governors	Provide appropriate oversight of the school's governance arrangements, policies and risk management relating to CCTV.

12. Equality, Inclusion and Safeguarding

12.1 Ramsden Primary School recognises that CCTV may capture children and adults who have different needs, vulnerabilities and circumstances. Its use will therefore be sensitive to safeguarding, privacy, dignity and equality considerations.

12.2 CCTV will not be used in a way that unfairly targets or discriminates against particular pupils, staff, families or groups.

12.3 CCTV footage may form part of safeguarding evidence where it is relevant to concerns about a child's safety or welfare. Access and disclosure will remain subject to appropriate legal, safeguarding and data protection requirements.

12.4 CCTV does not replace professional judgement. Staff should continue to follow the school's safeguarding, behaviour, attendance, supervision and incident-reporting procedures.

Document control: This policy should be read alongside Ramsden Primary School's Data Protection, Subject Access Request, Safeguarding, Complaints and Data Breach procedures.