



## CCTV POLICY AND PRIVACY NOTICE

Responsible: Governors, Data Protection Officer

Agreed: June 2025

To be reviewed: Annually (or earlier if legislation changes)

Reviewed:

### 1. Purpose of the Policy

The purpose of this policy is to set out the position of St. Peter and St. Paul CE Primary School regarding the use of Closed Circuit Television (CCTV) within the school premises.

CCTV is used in selected areas of the school to:

- Promote the safety and welfare of children, staff and visitors.
- Provide a safe environment for 1:1 working where required.
- Deter and prevent crime and anti-social behaviour.
- Assist in managing the security of the school site and property.
- Support the effective safeguarding of children.

The use of CCTV is proportionate and in accordance with relevant legislation, including the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, and the Human Rights Act 1998.

### 2. Areas Covered by CCTV

CCTV cameras are currently in operation in the following areas:

- Mobile Classroom (for safe supervision of 1:1 work)
- Main Entrance (monitoring access and safeguarding visitors and staff)
- Obvious access points into the school building (to promote site security and safeguarding)
- Cloakroom areas (to promote behaviour expectations and safeguarding)
- Reading Book Area (to promote safeguarding and monitor interactions in this freely-accessed area)

**CCTV is not installed in:**

- General classrooms (other than the Mobile Classroom for safeguarding reasons)
- Areas where privacy is expected, such as toilets, changing rooms, or staff rooms.

### 3. Audio Recording

- Some CCTV cameras are equipped with audio recording capability.

- Audio recording is used only to support safeguarding and the resolution of serious incidents, providing full context in areas where children may be working 1:1 or unsupervised for short periods (such as changing reading books).
- Audio is not used for routine monitoring.

#### 4. Operation and Management

The CCTV system is owned and operated by St. Peter and St. Paul CE Primary School.

- Recorded footage is securely stored and accessed only when required for a specific incident, safeguarding matter, or security investigation.
- Live footage from certain cameras (such as the Main Entrance and other key areas) is continuously displayed on screen in the school office to support site security, safeguarding, and appropriate visitor management.
- CCTV footage is monitored actively only when required; it is not subject to routine surveillance beyond this.
- Recorded footage is retained for a maximum of 30 days unless required longer for an ongoing investigation or legal matter.
- Footage may be shared with external agencies (such as the Police, Local Authority or relevant safeguarding partners) when lawful and appropriate.

#### 5. Legal Basis

The legal basis for the use of CCTV and audio recording is:

- Article 6(1)(f) UK GDPR — legitimate interests (protecting the safety of children, staff and visitors, safeguarding children, protecting property).
- Article 9(2)(g) UK GDPR — substantial public interest in safeguarding children and individuals at risk.

#### 6. Data Subject Rights

Individuals whose images or audio are recorded on CCTV have the right to:

- Request access to footage in which they appear (subject to legal exemptions).
- Request erasure or restriction of footage where appropriate.
- Lodge a complaint with the Information Commissioner's Office (ICO) if they have concerns about the school's use of CCTV.

Requests should be made in writing to the Headteacher.

#### 7. Review and Oversight

This policy will be reviewed annually or sooner if required by changes in legislation or operational needs.

The Headteacher and Governors will oversee the ongoing appropriate use of CCTV to ensure it continues to serve its intended safeguarding and security purposes, and that privacy and data protection principles are upheld.