

Cragside Church of England Primary School



CCTV Policy

Revised: September 2026

Date of next Review: September 2028 (or earlier if there are any changes to technology, legislation or school operations)

Policy Location:	Agreed by Governors:	Review Due:	Person Responsible:
This policy is available on the school website and electronically	4/10/26	September 2028	Headteacher

1. Purpose and scope

Cragside Church of England Primary School operates a closed-circuit television (CCTV) system on its school premises.

The purpose of this policy is to explain how the school operates and manages its CCTV system and how CCTV images are collected, stored, accessed, used and disclosed.

The policy applies to CCTV images and associated information collected by the school's CCTV system and to all staff, governors, volunteers, contractors and other individuals who have authorised access to the system or footage.

The school recognises that CCTV routinely captures images of children, staff, parents and carers, visitors, contractors and other members of the school community. CCTV is therefore operated carefully and proportionately, with particular regard to the privacy and rights of children.

The school will comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other relevant legislation and guidance.

2. Purpose of the CCTV system

The school uses CCTV to support the safety and security of the school community and its premises.

The purposes of the CCTV system are to:

- help protect pupils, staff, visitors and other members of the school community from harm;
- protect school buildings, grounds, equipment and other property;
- deter and assist in the investigation of crime;
- assist the police and other appropriate authorities in the prevention and detection of crime;
- assist in establishing the circumstances of accidents, incidents or serious events occurring on school premises;
- assist in investigating safeguarding concerns where CCTV footage is relevant;
- assist in the investigation of serious incidents involving pupils, staff or visitors;
- assist in resolving complaints or disputes where CCTV footage is relevant;
- assist with appropriate disciplinary or grievance investigations where CCTV footage is relevant;
- support the school in defending or pursuing legal proceedings or insurance claims where necessary; and
- provide evidence where this is necessary and lawful.

CCTV is not intended to be used as a general system for monitoring staff performance, teaching practice or pupils' routine behaviour.

Where CCTV incidentally captures an event that is relevant to a safeguarding, disciplinary, behavioural, complaint, legal or other legitimate investigation, the footage may be reviewed where this is necessary, proportionate and lawful.

The school will not use CCTV for a purpose that is incompatible with the purposes set out in this policy unless the proposed use has first been appropriately assessed and documented in accordance with data protection requirements.

3. Lawful basis and data protection

CCTV images are personal data where individuals can be identified.

The school will process CCTV footage in accordance with the principles of the UK GDPR and the Data Protection Act 2018.

The school's Article 6 lawful basis for operating CCTV is **public task**, subject to confirmation and documentation by the school's Data Protection Officer.

The school considers the use of CCTV to be necessary and proportionate for the purposes identified in this policy, including the protection of children and adults, safeguarding, school security, the protection of property and the investigation of serious incidents.

The school will:

- only collect CCTV images that are necessary for its stated purposes;
- ensure cameras are positioned appropriately and are not unnecessarily intrusive;
- avoid capturing areas where individuals would have a reasonable expectation of privacy;
- retain footage only for as long as necessary;
- restrict access to authorised individuals;
- keep footage secure;
- maintain appropriate records of CCTV processing;
- provide appropriate information to individuals about the use of CCTV; and
- regularly review whether the continued use of CCTV remains necessary, proportionate and effective.

The school will not rely on consent as the general lawful basis for routine CCTV recording.

The school does not currently use facial recognition, biometric identification or other automated identification technology through its CCTV system.

4. Children and CCTV

Because Craggside is a primary school, children are routinely captured by the CCTV system.

The school recognises that children may require particular consideration when their personal information is processed.

CCTV will therefore be used in a way that:

- respects children's privacy and dignity;
- is proportionate to the identified purpose;
- avoids unnecessary monitoring;
- does not routinely monitor individual children;
- does not replace appropriate supervision or safeguarding procedures; and
- supports the school's wider safeguarding responsibilities.

Where CCTV footage forms part of a safeguarding concern or investigation, it will be handled in accordance with the school's Safeguarding and Child Protection Policy as well as data protection requirements.

Where a request for CCTV footage relates to a child, the school will consider whether the child is competent to exercise their rights and, where a request is made by a parent, carer or another person on the child's behalf, whether that person is entitled to act on the child's behalf and whether disclosure is appropriate.

The school will consider the child's best interests and the rights and freedoms of other individuals when responding to requests for information about children.

5. Camera locations and positioning

Cameras are located only in areas where monitoring is considered necessary to achieve the purposes set out in this policy.

The school's current CCTV cameras are positioned as follows:

1. **Front left-hand corner of the front elevation** – viewing the front entrance and approach.
2. **Front right-hand corner of the front elevation** – viewing the playground and entry doors.
3. **Front right-hand corner of the right-side elevation** – viewing the pathway and field.
4. **Rear right-hand corner of the right-side elevation** – viewing the pathway and field.
5. **Rear right-hand corner of the rear elevation** – viewing the forest area.
6. **Rear right-hand corner of the rear elevation** – viewing the rear playground and gate.
7. **Rear left-hand corner of the rear elevation** – viewing the rear playground and gate.
8. **Rear left-hand corner of the left-side elevation** – viewing the side gate and garden area.
9. **Front left-hand corner of the left-side elevation** – viewing the pathway and general area.
10. **Under the canopy** – viewing the kitchen doors.
11. **Rear right-hand corner of the left-side elevation** – viewing the Reception door and approach.

The school will ensure that cameras are positioned externally so that they capture only the areas necessary for the purposes of the CCTV system. There are no internal CCTV cameras.

Cameras will not intentionally be aimed into neighbouring private property.

Where a camera's field of view includes an area outside the school premises, the school will consider whether this is necessary and proportionate and will use appropriate privacy masking or other technical measures where required.

The school will maintain an up-to-date record of camera locations and their intended fields of view.

6. CCTV signage and transparency

Appropriate CCTV signage will be displayed in locations where individuals are likely to enter an area covered by the system.

Signage will, where appropriate:

- make it clear that CCTV is operating;
- identify Cragside Church of England Primary School as the operator/data controller;
- state the principal purposes for which CCTV is used; and
- provide appropriate contact details for further information.

The school's Privacy Notice will provide further information about how personal data, including CCTV images, is processed and about individuals' data protection rights.

The school will make appropriate information available to parents, carers, staff, pupils and visitors where necessary to ensure that the use of CCTV is transparent.

7. Audio recording

The school's CCTV system **does not record audio**.

Audio recording will not be enabled unless the school first establishes that this is necessary, proportionate and lawful and undertakes an appropriate review of its data protection implications.

Any significant change to the system's recording capability will be subject to appropriate consultation with the Data Protection Officer and, where required, a review of this policy and the school's DPIA.

8. Covert surveillance

The school does not routinely use covert CCTV or covert surveillance.

Cameras will normally be visible and individuals will be informed that CCTV is operating.

In exceptional circumstances, the school may consider covert surveillance where there is a serious and specific concern and where overt surveillance would be inappropriate or ineffective.

Any proposal to use covert surveillance must be discussed with the Data Protection Officer before implementation and must be supported by a documented assessment of:

- necessity;
- proportionality;
- the purpose of the surveillance;
- the expected duration;
- the area to be monitored;
- who will have access to the resulting information; and
- the arrangements for secure storage and deletion.

Where appropriate, the school will seek advice from the Local Authority, legal advisers or other relevant agencies before undertaking covert surveillance.

Covert surveillance will not be used simply as a means of routinely monitoring pupils or staff.

9. Roles and responsibilities

9.1 Governing body

The governing body has overall responsibility for ensuring that the school's CCTV arrangements operate within this policy and relevant data protection requirements.

The governing body will receive appropriate assurance that:

- CCTV remains necessary and proportionate;
- the system is appropriately managed;
- access is appropriately restricted;
- risks have been considered through the school's data protection arrangements; and
- this policy is reviewed appropriately.

9.2 Headteacher

The Headteacher will:

- have day-to-day responsibility for the operation and management of the CCTV system;
- ensure that CCTV is used for the purposes set out in this policy;
- work with the Data Protection Officer to ensure that CCTV use is lawful, necessary and proportionate;
- ensure that staff with access to CCTV receive appropriate training;
- approve access to CCTV footage where appropriate;
- approve significant changes or upgrades to the CCTV system following appropriate advice;
- consider requests for disclosure to third parties in consultation with the Data Protection Officer;
- ensure that serious incidents involving CCTV are managed appropriately; and
- ensure that this policy is reviewed.

9.3 Data Protection Officer

The Data Protection Officer will:

- advise the school on compliance with data protection legislation;
- advise on the school's lawful basis for CCTV processing;
- advise on and assist with DPIAs and other data protection assessments;
- advise on individual rights and subject access requests;
- provide or arrange appropriate data protection training;
- monitor compliance with the school's CCTV arrangements;
- advise on requests for third-party disclosure;
- advise on data breaches involving CCTV footage;
- ensure appropriate retention and deletion arrangements are in place;
- advise on the use of CCTV for safeguarding, disciplinary or other investigations where data protection issues arise; and
- act as a point of contact with the Information Commissioner's Office where appropriate.

9.4 System Manager

The System Manager will:

- oversee the day-to-day operation and maintenance of the CCTV system;
- ensure that cameras and recording equipment are functioning appropriately;
- maintain the security of the system;

- ensure system date and time settings are accurate;
- carry out appropriate checks of the system;
- report faults promptly;
- ensure that access is restricted to authorised users;
- ensure that system updates and security patches are applied appropriately; and
- maintain appropriate records of system checks and faults.

10. Operation of the CCTV system

The CCTV system operates continuously, 24 hours a day, 365 days a year.

The system does not record audio.

Recordings will contain appropriate date and time information.

The accuracy of the system's date and time settings will be checked at least termly and whenever the clocks change.

The school will ensure that CCTV equipment is maintained and that faults are identified and addressed promptly.

CCTV will not guarantee that every incident will be captured.

11. Retention and deletion of CCTV footage

The school's standard CCTV retention period is **30 days**.

This period has been determined having regard to the school's operational requirements, including the need to identify and investigate incidents which may not be reported immediately, while ensuring that footage is not retained longer than necessary.

Footage will normally be automatically overwritten at the end of the retention period.

The school will not retain CCTV footage simply because it may be useful at some future point.

Where footage is required for a specific and identified purpose, it may be retained beyond 30 days where this is necessary and lawful. This may include:

- a safeguarding investigation;
- a serious behavioural incident;
- a complaint;
- a disciplinary or grievance investigation;
- an insurance claim;
- legal proceedings;
- a subject access request;
- an investigation by the police or another lawful authority; or
- another legitimate and documented purpose.

Where footage is retained beyond the standard retention period, the reason for extended retention should be recorded and the footage should be securely deleted when it is no longer required.

The school will undertake periodic checks to ensure that footage is being deleted in accordance with the retention period.

12. Security of CCTV footage

CCTV footage will be treated as confidential personal information.

Access to CCTV footage will be restricted to authorised individuals who require access for a legitimate purpose.

The school will use appropriate technical and organisational measures to protect CCTV footage from:

- unauthorised access;
- accidental loss;
- inappropriate disclosure;
- alteration or destruction;
- theft; and
- cyber security threats.

CCTV systems and associated equipment will be password protected where appropriate.

Recording and monitoring equipment will be securely located.

Footage will be stored securely and encrypted where the system and circumstances permit.

CCTV footage downloaded for investigation, disclosure or evidential purposes will be stored securely and, where appropriate, encrypted.

Footage will not be stored on personal devices or personal cloud storage.

CCTV footage must not be copied, photographed, filmed or shared using personal mobile phones or other unauthorised devices.

Any suspected loss, unauthorised access or inappropriate disclosure of CCTV footage must be reported immediately to the Headteacher and Data Protection Officer and managed in accordance with the school's data breach procedures.

13. Access to CCTV footage

Access to CCTV footage will only be provided where there is a legitimate and lawful reason.

Authorised individuals currently include:

- **Headteacher/Designated Safeguarding Leader:** Joanne Parker
- **Deputy Headteacher and Deputy Designated Safeguarding Leader:** Caroline Bilton
- **Data Protection Officer:** Julie Graham
- **System Manager:** Julie Graham / Iain Trobe
- **Other individuals:** only where expressly authorised by the Headteacher or Data Protection Officer for a specific legitimate purpose.

Access will be limited to the minimum footage necessary for the purpose.

Anyone accessing CCTV footage must maintain confidentiality and must not disclose footage to anyone who does not have a legitimate reason to receive it.

An access log will be maintained where footage is viewed, downloaded or disclosed for an investigative or other specific purpose. The log should record, where appropriate:

- the date and time of access;
- the name of the person accessing the footage;
- the reason for access;
- the relevant date/time/location of the footage;
- whether footage was downloaded or disclosed; and
- the recipient, where applicable.

CCTV monitors will be positioned so that footage cannot be viewed by unauthorised individuals.

CCTV footage will only be accessed from authorised devices or authorised monitoring equipment.

14. CCTV and safeguarding

CCTV may be used to assist the school in responding to safeguarding concerns where relevant footage exists.

Examples may include:

- an allegation concerning the safety or welfare of a child;
- a serious incident involving a child;
- an unexplained injury or incident;
- an allegation concerning an adult working at or visiting the school;
- concerns about unauthorised access to the school site; or
- another serious safeguarding concern where CCTV footage may assist in establishing what happened.

CCTV footage will not replace normal safeguarding procedures.

Where footage is relevant to a safeguarding concern, it will be handled in accordance with the school's Safeguarding and Child Protection Policy and data protection requirements.

Where a safeguarding concern may involve a criminal offence or serious risk of harm, the school may share relevant footage with the police, children's social care or another appropriate agency where there is a lawful basis for doing so.

The school will disclose only the footage that is reasonably necessary for the relevant purpose.

15. Disclosure to the police, courts and other third parties

CCTV footage may be disclosed to a third party where there is a lawful basis for doing so.

This may include:

- the police;
- children's social care;
- the Local Authority;
- a court or tribunal;
- an insurance company or loss adjuster where appropriate;
- legal representatives where appropriate;
- another public authority or professional body where there is a lawful basis; or
- another organisation where disclosure is necessary and lawful.

Requests for CCTV footage should normally be made in writing and directed to the Headteacher and/or Data Protection Officer.

The school will consider:

- the identity and authority of the requester;
- the purpose for which the footage is requested;
- the lawful basis for disclosure;
- whether the footage is relevant and necessary;
- whether disclosure would unfairly affect the rights and freedoms of other individuals; and
- whether only part of the footage should be disclosed.

The school will not provide unrestricted access to its CCTV system to external organisations.

Where footage is disclosed, the disclosure will be recorded appropriately.

Where a court order or other lawful requirement requires disclosure, the school will comply with the requirement while limiting disclosure to the information required.

Where appropriate, the school may seek advice from the Data Protection Officer, Local Authority or legal advisers before making a disclosure.

16. Subject Access Requests

Individuals have rights under data protection legislation to request access to their personal data, including CCTV footage in which they are identifiable.

A subject access request (SAR) may be made verbally or in writing. A person does not have to use the words "subject access request" or refer to data protection legislation.

Any staff member who receives a request that may be a SAR should refer it promptly to the Data Protection Officer.

Where possible, the requester should provide sufficient information to help the school locate the relevant footage, such as:

- the date;
- approximate time;
- location; and
- description of the incident.

The school will respond to SARs in accordance with applicable data protection legislation. Requests will normally be responded to without undue delay and within one month.

Where permitted by law, the response period may be extended where a request is complex or a number of requests have been made.

The school may need to preserve relevant footage to prevent it being automatically overwritten while a request is being considered.

Where footage contains information about other identifiable individuals, the school will consider whether that information should be redacted or otherwise withheld, taking account of the rights and freedoms of those individuals.

Redaction may include blurring, masking or other appropriate techniques.

The school will not automatically seek the consent of every other person appearing in footage. The Data Protection Officer will consider whether disclosure is reasonable and lawful in the circumstances.

Where a SAR relates to a child, the school will consider:

- whether the child is competent to exercise their right of access;
- whether the person making the request is authorised to act on the child's behalf;
- the child's best interests; and
- the rights and freedoms of other individuals appearing in the footage.

Where a request is manifestly unfounded or excessive, the school may refuse to comply or charge a reasonable fee where permitted by law. The school will document the basis for such a decision.

CCTV footage supplied in response to a SAR will be provided securely.

The school will maintain appropriate records of requests and disclosures.

17. Other individual rights

Individuals may have other rights under data protection legislation, depending on the circumstances, including rights relating to:

- rectification;
- erasure;
- restriction of processing;
- objection; and
- other applicable rights.

These rights may be subject to legal exemptions and are not absolute in all circumstances.

Requests concerning CCTV will be referred to the Data Protection Officer.

18. Data Protection Impact Assessment

The school will use a privacy-by-design and privacy-by-default approach when operating, replacing, developing or upgrading the CCTV system.

The school will maintain an appropriate Data Protection Impact Assessment (DPIA) where required and will review it when there are significant changes to the system or its use.

A DPIA or review will be undertaken where appropriate, including when:

- new cameras are installed;
- cameras are moved;
- the field of view is significantly changed;
- new recording functionality is introduced;
- audio recording is proposed;
- facial recognition or biometric technology is proposed;
- monitoring becomes substantially more intrusive; or
- there is another significant change in the nature or scale of processing.

The DPIA will consider:

- necessity;
- proportionality;
- the purposes of CCTV;
- the impact on pupils, staff, visitors and other individuals;
- the particular interests and rights of children;
- privacy risks;
- security;
- retention;
- access;
- disclosure;
- transparency; and
- appropriate safeguards.

The Data Protection Officer will provide advice on the DPIA.

Where a proposed change creates a high risk that cannot be adequately mitigated, the school will seek appropriate advice before proceeding.

19. Monitoring and review

The school will monitor the operation of the CCTV system to ensure that:

- cameras continue to serve a legitimate purpose;
- camera positioning remains appropriate;
- access remains restricted;
- footage is retained and deleted appropriately;
- system date and time settings are accurate;
- security arrangements remain effective;
- incidents and disclosures are appropriately recorded; and
- the system remains necessary, proportionate and effective.

The school will review this policy at least every two years and sooner where there are:

- changes in legislation or statutory guidance;
- changes in ICO guidance;
- significant changes to the CCTV system;
- new technology or functionality;
- significant changes to school operations; or
- concerns about the effectiveness or proportionality of the system.

The policy will be reviewed by the Headteacher in consultation with the Data Protection Officer.

20. Complaints

Any complaint about the operation or use of the CCTV system should initially be made to the Headteacher.

Complaints will be considered in accordance with the school's Complaints Policy.

Where a complaint concerns the processing of personal data, the school's Data Protection Officer may also be involved.

Individuals who remain dissatisfied with the school's handling of their personal data may have the right to complain to the Information Commissioner's Office.

21. Related policies and documents

This policy should be read alongside:

- Safeguarding and Child Protection Policy;
- Data Protection Policy;
- Privacy Notice;
- Staff Code of Conduct;
- Staff Handbook;
- Behaviour Policy;
- Complaints Policy;
- Information Security / Cyber Security arrangements;
- Records Retention arrangements; and
- relevant risk assessments and the school's CCTV Data Protection Impact Assessment.

22. Policy statement

Craggs Church of England Primary School recognises that CCTV can make an important contribution to the safety and security of children, staff and visitors and to the protection of school property.

The school will, however, use CCTV only where it is **necessary, proportionate, lawful and appropriately managed**.

The school will seek to balance the legitimate benefits of CCTV with the privacy and data protection rights of the children, staff, families, visitors and other individuals whose images may be captured.

The school will not use CCTV as a substitute for appropriate safeguarding, supervision, behaviour management or other school procedures.

The Headteacher and governing body will ensure that the CCTV system continues to operate in accordance with this policy and relevant data protection requirements.