

St Luke's C of E Primary School

CCTV Policy

Approved by Governors: November 2026

To be reviewed: November 2029

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1. Data Protection:

Any personal data processed in the delivery of this policy will be processed in accordance with the school Data Protection Policy. Further information can also be found in the Record of Processing Activity.

2. Policy Statement

St. Luke's uses Closed Circuit Television ("CCTV") within the school site. The purpose of this policy is to set out the operation, use, storage and disclosure of CCTV at the School.

This policy applies to all data subjects whose image may be captured by the CCTV system. It works in concurrence with the School's Data Protection Policy, Record of Processing Activity and Data Retention Schedule.

The policy considers applicable legislation and guidance, including but not limited to;

- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act (DPA) 2018
- Video Surveillance Code of practice as produced by the Information Commissioner's Office (ICO)
- Protection of Freedom Act (PoFA) 2012
- Human Rights Act 1998.

The CCTV system is owned and operated by St. Luke's. The deployment is determined by the Senior Leadership Team, with input from the Board of Governors and Data Protection Officer (DPO).

The school will:

- Notify the ICO of its use of CCTV as part of its registration.
- Complete a Data Privacy Impact Assessment if amendments are to be made to the deployment or use of CCTV.
- Treat the system and all information processed on the CCTV system as data which is processed under DPA 2018/UK GDPR.
- Not direct cameras outside of school grounds onto private property, an individual, their property or a specific group of individuals. The exception to this would be if authorisation was obtained for Direct Surveillance as set up by the Regulatory of Investigatory Powers Act 2000.
- Display warning signs clearly in prominent places.

  Specifically, at all entrances to the school site and premises where CCTV is in use. Additionally, any public areas, where a passer-by may be recorded. Where necessary these signs will include information on how to contact the school regarding information or access to the CCTV footage.
- Not use CCTV footage for any commercial purposes.

There is no guarantee that this system will or can cover and detect every single incident taking place in the areas of coverage.

3. Camera Setup

The CCTV system is comprised of 12 cameras which record day and night covering the **Internal and External** areas of the School.

Cameras will be placed so they only capture images relevant for the purposes for which they are installed, and all care will be taken to ensure that reasonable privacy expectations are not violated.

CCTV is not sited in classrooms, except in exceptional circumstances.

Members of staff can request details of CCTV camera locations. The decision to provide this information will be determined by Senior Leadership and recorded as appropriate.

4. Purpose of CCTV

The School uses CCTV for the following purposes:

- To provide a safe and secure environment for the school workforce, pupils and visitors.
- To protect the school buildings and assets.
- To assist in the investigation of incidents.
- To assist in the prevention and detection of criminal activity.
- To assist law enforcement agencies in apprehending suspected offenders.

5. Covert Monitoring

The school retains the right in exceptional circumstances to set up covert monitoring. For example:

- Where there is good cause to suspect illegal or serious unauthorised action(s) are 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.

In these circumstances authorisation must be obtained from the Head Teacher and Chair of Governors.

Covert monitoring will cease following the completion of any investigation.

6. Storage and Retention

Recorded data will not be retained for longer than is necessary. While retained the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of people who images have been recorded.

All data will be stored securely.

The monitor to view CCTV footage will be kept securely in the main office.

Recordings will be kept for **14 days,** unless there is a specific purpose for which they are required, then they will be retained for a longer period.

These will be stored on our cloud system, with adequate data back up.

Access to CCTV Images

The ability to view live and historical CCTV footage is only to be provided at designated locations and by authorised persons.

Specific live monitoring is limited to the areas where the cameras ace.

Direct access to recorded footage is limited to the Senior Leadership Team and Head of First Aid/Lunchtime.

Only in exceptional circumstances will any other individuals be allowed to view footage. The reasons for and details of these circumstances will be recorded at the time such a decision is made.

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.

7. Disclosure of Images to Data Subjects (Subject Access Requests)

Any individual recorded in any CCTV image is considered a data subject and therefore has the right to request access to those images.

These requests will be considered a Subject Access Request and should follow the school's Subject Access Request process, which can be located in our Data Protection policy.

When such a request is made, the footage will be reviewed in accordance with the request.

If the footage contains only the data subject making the request, then the individual may be permitted to view the footage.

This will be strictly limited to the footage of the data subject making the request and the specific reason for the request.

If the footage contains images of other data subjects, then the school will consider whether.

- The request requires the disclosure of the images of data subjects other than the requester, and whether these additional data subjects can be anonymized in the footage.
- The other individuals in the footage have consented to the disclosure of the images or if their consent could be obtained.
- If not, then whether it is reasonable in the circumstances to disclose those images to the data subject making the request.

The School reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other data subjects or jeopardise an ongoing investigation.

8. Disclosure of Images to Third Parties

The School will only disclose recorded CCTV footage to third parties where there is a lawful basis to do so.

Third parties acting on behalf of a data subject will be handled in accordance with the usual Subject Access Request process.

CCTV footage will only be disclosed to law enforcement agencies in line with the purpose for which the CCTV system is in place.

If a request is received from a law enforcement agency for the disclosure of footage, then the school will ask for an explanation of the reasoning for wanting to obtain the footage.
This will give help enable proper consideration of the extent of what can appropriately be disclosed.

If an order is granted by a court for the disclosure of CCTV images, then this will be complied with, but consideration will be given to exactly what the order requires.

In all instances, if there are any concerns as to what should or should not be disclosed then the Data Protection Officer will be contacted and further legal advice sought if necessary.

9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with the school in the first instance via our complaints procedure.

This complaint may be assessed by our independent Data Protection Officer, Jay Makwana (jay.makwana@london.anglican.org or 020 3837 5073) with a final response provided within 30 days.

If you are unhappy with the school's final response you can refer the matter to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF