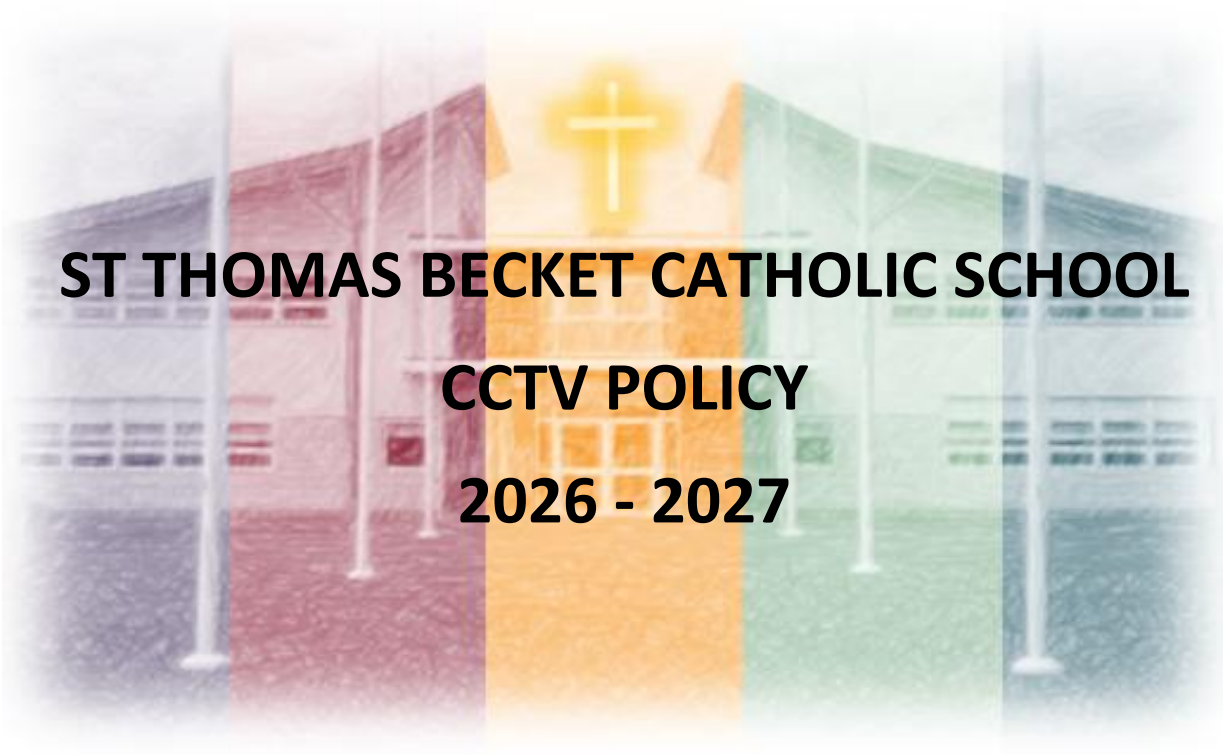


ST THOMAS BECKET CATHOLIC SCHOOL

CCTV POLICY

2026 - 2027

Approved by:	Local Academy Committee	**Date: October 2026**
Next review due by:	Local Academy Committee	**Date: September 2027**

Contents

1. Aims 3
2. Relevant legislation and guidance 3
3. Definitions 4
4. Covert surveillance 4
5. Location of the cameras 4
6. Roles and responsibilities 5
7. Operation of the CCTV system 6
8. Storage of CCTV footage 6
9. Access to CCTV footage 7
10. Security 8
11. Complaints 8
12. Monitoring 8
13. Links to other policies 8

1. Aims

The purpose of the CCTV system is to:

- Make members of the school community feel safe.
- Protect members of the school community from harm to themselves or their property.
- Deter criminality in the school.
- Protect school assets and buildings.
- Assist police in deterring and detecting crime.
- Determine the cause of accidents.
- Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings.
- Assist in the defence of any litigation proceedings.

The CCTV system will not be used to:

- Encroach on an individual's right to privacy.
- Monitor people in spaces where they have a heightened expectation of privacy (including toilets and changing rooms).
- Follow particular individuals unless there is an ongoing emergency incident occurring.
- Pursue any other purposes than the ones stated above.
- Footage or any information gleaned through the CCTV system will never be used for commercial purposes.
- The footage generated by the system should be of good enough quality to be of use to the police or the court in identifying suspects.
- Easipc have access to procedural and operational checks.

The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

2. Relevant legislation and guidance

2.1 Legislation

- UK General Data Protection Regulation
- Data Protection Act 2018
- Human Rights Act 1998
- European Convention on Human Rights
- The Regulation of Investigatory Powers Act 2000
- The Protection of Freedoms Act 2012
- The Freedom of Information Act 2000

- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The School Standards and Framework Act 1998
- The Children Act 1989
- The Children Act 2004
- The Equality Act 2010

2.2 Guidance

- Surveillance Camera Code of Practice (2021)

3. Definitions

- **Surveillance:** The act of watching a person or a place.
- **CCTV:** Closed circuit television; video cameras used for surveillance.
- **Covert surveillance:** Operation of cameras in a place where people have not been made aware they are under surveillance.

4. Covert surveillance

- Covert surveillance will only be used in extreme circumstances such as where there is suspicion of a criminal offence. If the situation arises where covert surveillance is needed (such as following police advice for the prevention or detection of crime or where there is a risk to public safety), a data protection impact assessment will be completed to comply with data protection law.

5. Location of the cameras

Cameras are located in places that require monitoring to achieve the aims of the CCTV system (stated in section 1). Cameras are located in:

- Entrances and exits
- Corridors
- Playgrounds
- Car parks
- Other key areas as determined by the school administration

Wherever cameras are installed, appropriate signage is in place to warn members of the school community that they are under surveillance. The signage:

- Identifies the school as the operator of the CCTV system.
- Identifies the school as the data controller.

- Provides contact details for the school.

Cameras are not and will not be aimed off school grounds into public spaces or people's private property. Cameras are positioned to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

6. Roles and responsibilities

6.1 The Governing Board

- The governing board has the ultimate responsibility for ensuring the CCTV system is operated within the parameters of this policy and that the relevant legislation (defined in section 2) is complied with.

6.2 The Headteacher

The headteacher will:

- Take responsibility for all day-to-day leadership and management of the CCTV system.
- Liaise with the data protection officer (DPO) to ensure that the use of the CCTV system is in accordance with the stated aims and that its use is needed and justified.
- Ensure that the guidance set out in this policy is followed by all staff.
- Review the CCTV policy to check that the school is compliant with legislation.
- Ensure all persons with authorisation to access the CCTV system and footage have received proper training from the DPO in the use of the system and in data protection.
- Sign off on any expansion or upgrading to the CCTV system after having taken advice from the DPO and taken into account the result of a data protection impact assessment.
- Decide, in consultation with the DPO, whether to comply with disclosure of footage requests from third parties.

6.3 The Data Protection Officer

The data protection officer (DPO) will:

- Train persons with authorisation to access the CCTV system and footage in the use of the system and in data protection.
- Train all staff to recognise a subject access request.
- Deal with subject access requests in line with the Freedom of Information Act (2000).
- Monitor compliance with UK data protection law.
- Advise on and assist the school with carrying out data protection impact assessments.
- Act as a point of contact for communications from the Information Commissioner's Office.
- Conduct data protection impact assessments.
- Ensure data is handled in accordance with data protection legislation.
- Ensure footage is destroyed when it falls out of the retention period.

- Keep accurate records of all data processing activities and make the records public on request.
- Inform subjects of how footage of them will be used by the school, what their rights are, and how the school will endeavour to protect their personal information.
- Ensure that the CCTV systems are working properly and that the footage they produce is of high quality so that individuals pictured in the footage can be identified.
- Ensure that the CCTV system is not infringing on any individual's reasonable right to privacy in public spaces.
- Carry out termly checks to determine whether footage is being stored accurately and being deleted after the retention period.
- Receive and consider requests for third-party access to CCTV footage.

6.4 The System Manager

The system manager will:

- Take care of the day-to-day maintenance and operation of the CCTV system.
- Oversee the security of the CCTV system and footage.
- Check the system for faults and security flaws termly.
- Ensure the data and time stamps are accurate termly.

7. Operation of the CCTV system

- The CCTV system will be operational 24 hours a day, 365 days a year. The system is registered with the Information Commissioner's Office. The system will not record audio. Recordings will have date and time stamps. This will be checked by the system manager termly and when the clocks change.

8. Storage of CCTV footage

- The images that are filmed will be held in a secure location and can only be accessed by those individuals authorised to do so. Authority for this purpose will be given by any member of the Senior Leadership Team only.
- The medium on to which the school records images is:
  a. hard disk
- Images are retained for a maximum of 60 days at which point they will automatically be replaced by the current day's recording.
- Images required for evidential purposes beyond this period will be transferred to encrypted school devices only, retained for no longer than essential for the purpose.
- A regular maintenance programme is in place and will be carried out in accordance with the agreed schedule by: Thomas Becket Catholic School – Prime Digital.
- Images required for evidential purposes beyond this period will be transferred to encrypted USB and held by the school, retained for no longer than essential for the purpose.

9. Access to CCTV footage

9.1 Staff Access

The following members of staff have authorisation to access the CCTV footage:

- The headteacher
- The deputy head
- The data protection officer
- The system manager
- Designated pastoral chat
- Anyone with express permission of the headteacher

CCTV footage will only be accessed from authorised personnel's work devices or from the visual display monitors. All members of staff who have access will undergo training to ensure proper handling of the system and footage. Any member of staff who misuses the surveillance system may be committing a criminal offence and will face disciplinary action.

9.2 Subject Access Requests (SAR)

According to UK GDPR and Data Protection Act 2018, individuals have the right to request a copy of any CCTV footage of themselves. Upon receiving the request, the school will immediately issue a receipt and will then respond within 30 days during term time. The school reserves the right to extend that deadline during holidays due to difficulties accessing appropriate staff members.

All staff have received training to recognise SARs. When a SAR is received, staff should inform the DPO in writing. When making a request, individuals should provide the school with reasonable information such as the date, time, and location the footage was taken to aid school staff in locating the footage.

On occasion, the school will reserve the right to refuse a SAR if, for example, the release of the footage to the subject would prejudice an ongoing investigation. Images that may identify other individuals need to be obscured to prevent unwarranted identification.

The school reserves the right to charge a reasonable fee to cover the administrative costs of complying with an SAR that is repetitive, unfounded, or excessive. Footage that is disclosed in a SAR will be disclosed securely to ensure only the intended recipient has access to it.

Records will be kept that show the date of the disclosure, details of who was provided with the information (the name of the person and the organisation they represent), and why they required it. Individuals wishing to make an SAR can find more information about their rights, the process of making a request, and what to do if they are dissatisfied with the response to the request on the ICO website Information Commissioner's Office (ICO) or Request CCTV footage of yourself - GOV.UK (www.gov.uk)

9.3 Third-Party Access

CCTV footage will only be shared with a third party to further the aims of the CCTV system set out in section 1.1 (e.g., assisting the police in investigating a crime). Footage will only ever be shared with authorised personnel such as law enforcement agencies or other service providers who reasonably

need access to the footage (e.g., investigators). All requests for access should be set out in writing and sent to the headteacher and the DPO.

The school will comply with any court orders that grant access to the CCTV footage. The school will provide the courts with the footage they need without giving them unrestricted access. The DPO will consider very carefully how much footage to disclose and seek legal advice if necessary. The DPO will ensure that any disclosures that are made are done in compliance with UK GDPR. All disclosures will be recorded by the DPO.

10. Security

The system manager will be responsible for overseeing the security of the CCTV system and footage. The system will be checked for faults once a term. Any faults in the system will be reported as soon as they are detected and repaired as soon as possible according to the proper procedure. Footage will be stored securely and encrypted wherever possible. The CCTV footage will be password protected and any camera operation equipment will be securely locked away when not in use. Proper cyber security measures will be put in place to protect the footage from cyber attacks. Any software updates (particularly security updates) published by the equipment's manufacturer that need to be applied will be applied as soon as possible.

11. Complaints

Complaints should be directed to the headteacher or the DPO and should be made according to the school's complaints policy.

12. Monitoring

The policy will be reviewed annually by the DPO to consider whether the continued use of a surveillance camera remains necessary, proportionate, and effective in meeting its stated purposes.

13. Links to other policies

- Data protection policy
- Behaviour
- Exclusion Policy
- Anti-Bullying Policy
- Safeguarding policY