Thornhill Primary School



CCTV Policy

Approved by: Resources & Community Committee

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Responsible Person: School Business Manager Supersedes: CCTV Policy, May 2025

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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

Thornhill Primary School uses Closed Circuit Television ("CCTV") within the premises of the school. 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 Data Processing and Data Retention Schedule.
The policy considers applicable legislation and guidance, including but not limited to;

- General Data Protection Regulation (GDPR)
- Data Protection Act (DPA) 2018
- CCTV Code of practice as produced by the Information Commissioner's Office (ICO)
- Human Rights Act 1998.

The CCTV system is owned and operated by the Thornhill Primary School/Xilant Fire and Security and the deployment is determined by the Senior Leadership Team, with input from the Governing Body 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/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 external entrances of the school site where CCTV is used and covers external areas. 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 16 cameras which record day and night covering the internal and external areas of the school. Their coverage also extends past the school boundaries to public areas.

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 on request can access details of CCTV camera locations.

4. Purpose of CCTV

The school uses CCTV for the following purposes:

- To provide a safe and secure environment for school staff, pupils and visitors.
- To protect the school buildings and assets.
- 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 the Governing Body. 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 whose images have been recorded.
All data will be stored securely.
The monitor to view CCTV footage will be kept **in the main school office.**
Recordings will be kept for **60 days**. These will be stored in the **main school office.**

7. 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: Main school office
Direct access to recorded footage is limited to the main school office and back office.

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.

8. 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.

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, copies can be provided.
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 anonymised 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.

9. 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 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.

10. 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.

If you remain unhappy you may wish to contact our Data Protection Officer: **Claire Meghan, GROW** **claire.mehegan@london.anglican.org**

Alternatively, you can make a complaint 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