



THE FEDERATION OF NETTLESTONE AND NEWCHURCH PRIMARY SCHOOLS

CCTV POLICY

Revision: 1



Date Agreed: September 2026 Review Date: August 2027

Co-Chair of Board of Governors

Executive Headteacher

All the Governors and staff of The Federation of Nettlestone & Newchurch Primary Schools are committed to sharing a common objective to help keep the children and staff of the school community safe. We ensure that consistent effective safeguarding procedures are in place to support families, children, and staff of the school.



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Document Control

Policy Owner: DJR				
Revision	Date Issued	Prepared By	Approved	Comments
1	Sept 26	MJ	PC	New policy created

1. Introduction and Purpose

1.1 The Federation uses Closed-Circuit Television (CCTV) and recording equipment to maintain a safe and secure environment for pupils, staff, parents, and visitors, and to protect school property.

1.2. The purpose of this policy is to set out how the school manages the collection, storage, use, and disclosure of CCTV footage, ensuring compliance with:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Human Rights Act 1998
- The Information Commissioner's Office (ICO) Data Protection Code of Practice for Surveillance Cameras and Personal Information



1.3. This policy applies to all staff, pupils, visitors, contractors, and any other individuals whose images may be recorded by the school's CCTV system.

2. Objectives of the CCTV System

The system is used for the following specific purposes:

- To promote a safe, healthy, and secure environment for pupils, staff, and visitors.
- To protect the school buildings, grounds, and assets against theft, vandalism, or unauthorised access.
- To assist in the prevention, detection, and investigation of crime or misconduct.
- To support school management in disciplinary processes involving staff or pupils, where appropriate and proportionate.
- To assist law enforcement agencies in identifying individuals in connection with criminal investigations.

3. System Management and Responsibilities

3.1. **Data Controller:** Newchurch Primary School and Nettlestone Primary School are the Data Controllers registered with the Information Commissioner's Office (ICO).

3.2. **System Manager:** Day-to-day management of the CCTV system is delegated to the **Executive Headteacher** and the **School Business Manager**.

3.3. Responsibilities include:

- Ensuring cameras are positioned correctly and operating effectively.
- Managing access to recorded footage and system monitors.
- Overseeing maintenance and technical inspections.
- Ensuring compliance with data protection principles.

4. Camera Locations and Signage

4.1. Cameras are installed strategically around the school premises, primarily covering key access points, perimeter boundaries, and external grounds.

4.2. Privacy Protections:

- CCTV cameras are **not** installed in areas where individuals have a heightened expectation of privacy, such as toilets, changing rooms, or staff rest areas.
- Cameras are positioned to avoid capturing images of private residential properties surrounding the school.

4.3. Signage:

- Clear, prominent signage is displayed at main entrances and throughout the school premises to notify pupils, staff, and visitors that CCTV is in operation.
- Signs include the purpose of the system and contact details for the school administration office (office@newchurchprimaryschool.co.uk / 01983 865210).

5. Operation and Live Monitoring

5.1. The CCTV system operates **24 hours a day, 7 days a week**.



5.2. Live monitors displaying footage are located in secure, non-public areas (e.g., the main admin office or site manager's room) and are restricted from view by unauthorised individuals or visitors.

5.3. Staff permitted to monitor or review footage are trained in data protection and confidentiality obligations.

6. Data Storage and Retention

6.1. **Retention Period:** Recorded footage is routinely stored for a maximum of **24 days**, after which it is automatically overwritten by the system.

6.2. Footage may be retained for longer than 24 days only if:

- An incident or alleged crime is under active investigation.
- It is required for ongoing legal proceedings or internal disciplinary actions.
- A Subject Access Request (SAR) has been received before the deletion date.

6.3. All recorded data is stored securely on encrypted digital recorders or servers protected by access controls, strong passwords, and firewall protection.

7. Access to CCTV Footage

7.1. Internal Access

Access to recorded footage is strictly limited to authorised personnel (e.g., Executive Headteacher, Designated Safeguarding Lead, Head of School) on a strict "need-to-know" basis.

7.2. Subject Access Requests (SARs)

- Under the UK GDPR, individuals (or parents acting on behalf of young pupils) have the right to request access to CCTV footage in which they appear.
- **How to Request:** Requests must be submitted in writing to the School Office (office@newchurchprimaryschool.co.uk).
- **Response Time:** The school will respond without delay and within **one calendar month** of receipt.
- **Third-Party Redaction:** To protect the privacy of others, footage containing images of third parties will be edited or blurred before disclosure, unless consent has been obtained or it is lawful to release unredacted footage.

7.3. Disclosure to Third Parties

Footage will only be disclosed to third parties under strict legal grounds, including:

- **The Police / Law Enforcement:** For the prevention, investigation, or detection of crime.
- **Legal Representatives:** Pursuant to a court order or formal legal requirement.
- **Insurance Companies / Loss Adjusters:** Where necessary to process a property claim or legal dispute.

8. Complaints and Inquiries

8.1. Any concerns or complaints regarding the operation of the CCTV system should be directed to the Executive Headteacher in accordance with the school's **Complaints Policy**.



8.2. If individuals remain dissatisfied with the school's response, they have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**:

- Website: www.ico.org.uk
- Helpline: 0303 123 1113

9. Policy Review

This policy will be reviewed annually by the Governing Body or earlier if relevant statutory guidance, legislation, or operational setups change.

Contact Details for Enquiries:

Newchurch Primary School

Email: office@newchurchprimaryschool.co.uk

Telephone: 01983 865210