
Great Gaddesden C of E (VA) Primary School



Small School - Big Heart - Great Start

Mission Statement: 'Treat others exactly as you would like to be treated yourself' (Luke 6:31)

CCTV Policy

Signature:

A handwritten signature in blue ink, appearing to be 'M. B.', written over a horizontal line.

Headteacher

Date: 20th May 2026

Date approved by governing body: 20th May 2026

Review cycle: Every three years

Rationale

Closed circuit television is installed and operated at Great Gaddesden School for security and health and safety purposes. Images from the installed cameras may be viewed and recorded.

Usually, the CCTV equipment and the images recorded by it are controlled by the Headteacher and Office Manager, who are responsible for how the system is used. In some circumstances, the CCTV system may be shared with another organisation, such as a facilities management company or an organisation that provides out of school hours activities. Where this is the case, there may be joint data controllers responsible for the CCTV system. If so, the joint data controller will be listed below.

When considering the installation of a new CCTV system or upgrading an existing system where:

- the views obtained are significantly altered or enhanced,
- additional cameras are added to a system, or
- existing systems are extended,

The school will use the 'Passport to Compliance', issued by the Surveillance Camera Commissioner. This ensures the surveillance camera system complies with the Guiding Principles set out in the Surveillance Camera Code of Practice published by the Home Office under the Protection of Freedoms Act 2012.

Aims

The purpose of this policy is to regulate the management, operation and use of the CCTV system at Great Gaddesden School and to ensure compliance with current legislation.

Article 6(1)(e) of the UK GDPR provides the school with a lawful basis for processing CCTV images where 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'.

Objectives of this CCTV Policy are:

- a) To increase the personal safety of pupils, staff and visitors, and reduce the fear of crime
- b) To protect the school buildings and their assets
- c) To support the Police in a bid to deter and detect crime
- d) To assist in identifying, apprehending and potentially prosecuting offenders
- e) To protect members of the public and private property
- f) To assist in managing the school

Procedures

Positioning of cameras

The system comprises a number of fixed cameras located internally and externally in and on the school building, all capturing only within the school grounds.

Signage

Signs are positioned around the school site as required by the Code of Practice. These signs indicate that CCTV monitoring and recording are in use on the premises.

Recording of CCTV images

Recordings may be made from any of the CCTV cameras. These recordings include a date, time and system information overlay. Recording equipment and media will be housed in a secure location accessible only to authorised staff. Recordings are normally kept for 30 days, unless required for an ongoing investigation, in which case recordings may be retained for as long as necessary. After 30 days, recordings will usually be overwritten.

The CCTV system operates 24 hours a day, every day of the year, recording all activity in the areas covered.

Materials or knowledge secured through CCTV will not be used for any commercial or media purpose.

The management of the CCTV system will be overseen by Headteacher who has the responsibility for the premises management. They are responsible for ensuring that the CCTV system is operated according to this policy and that regular audits are carried out. The Headteacher supported by South Security is responsible for day-to-day administration, maintenance, security and support.

Viewing of CCTV images

Display equipment used to view images from CCTV cameras is located securely so that visitors cannot see the screen. Where separate display equipment is provided for access control (e.g. at door entry points), it is positioned so that only authorised staff can view the images.

Recorded images are held securely and access to them is strictly controlled. CCTV footage may only be viewed with the permission of the Headteacher and only where there is a clear operational need, such as safeguarding, security or health and safety investigations. Viewing is restricted to authorised members of staff who require access to carry out their duties. The school does not permit routine viewing of CCTV footage by pupils, parents, carers or other members of the public.

Copies of images (electronic or paper) may only be made by the Headteacher or a person specifically authorised by them.

Authorised staff may allow external persons or agencies to view CCTV images only with the express permission of the Headteacher.

Requests by law enforcement agencies (most commonly the police) may be authorised by the school under the Data Protection Act 2018, Schedule 2, Part 1, Paragraph 2. A copy of images may be released to the agency on the understanding that the images remain the property of the school and must not be shared further without permission.

Applications received from outside bodies (e.g. solicitors) to view or release footage will be referred to the Headteacher. Footage will normally only be released where documentary evidence shows it is required for legal proceedings, or where disclosure is required by law or a Court Order.

Requests from other external individuals will be considered carefully to ensure they are genuine and necessary, and to assess any risks to the safety and privacy of others. Where other individuals are visible in recordings, the school will normally provide a written description of the incident rather than releasing footage, in order to protect third parties.

Subject Access Requests

The Data Protection Legislation allows individuals whose images have been recorded the right to request access to their own personal data. Where pupils are under 18, such requests may also be made by a parent or carer with parental responsibility. Because CCTV footage in schools will almost always include images of other pupils, staff or visitors, the school will not normally release video footage directly. Instead, still images may be provided as deemed appropriate and with other individuals securely redacted, or a written account of an incident may be given. Requests must be made in writing to the Headteacher and include sufficient detail to enable the school to locate the relevant images.

The school will respond within one month where possible, but may extend this by up to two further months if the request is complex. Requests may be refused where disclosure would prejudice the rights of others or jeopardise an investigation. Where footage contains images of third parties, these must be redacted before disclosure. This can be costly, and the school reserves the right to refuse or to recover reasonable costs where requests are excessive or manifestly unfounded.

All requests are logged, together with the outcome.

System maintenance

Display equipment and recordings may be accessed by authorised contractors (South Security) for installation and maintenance. Such access will be restricted to what is strictly necessary for system work.

Police cooperation

The school wishes to maintain good working relations with the police and will cooperate whenever lawful and appropriate.

Evaluation

This policy will be reviewed every two years.

Twelve Guiding Principles

The Surveillance Camera Code of Practice sets out the following 12 guiding principles for surveillance cameras in public places:

Specified Purpose: Surveillance must serve a legitimate aim and meet a pressing need.

1. Privacy Impact: Systems must consider privacy, with regular, justified reviews.
2. Transparency: Operations should be transparent, with accessible points of contact.
3. Accountability: Clear responsibility for activities, images, and data is required.
4. Policies & Procedures: Rules must be in place and communicated before system operation.
5. Data Retention: Data should only be stored as necessary and deleted when no longer required.
6. Access & Disclosure: Access to data must be restricted and managed via clear rules.
7. System Standards: Systems must be maintained to recognized technical standards.
8. Image Quality: Recorded images must be fit for their intended purpose.
9. Data Integrity: Information must be stored securely and maintain its integrity.
10. System Effectiveness: Users must be able to export data without interrupting operations.
11. Specialist Technology: Technologies like facial recognition must use accurate, up-to-date data.

CCTV – Privacy Notice

Closed circuit television is installed and operated at the school for security and health and safety purposes. Images from the installed cameras may be viewed and recorded. This privacy notice explains what personal information is collected, what it is used for and who it may be provided to. It should be read together with the school's general privacy notice.

What personal information does this service use?

The CCTV system captures images of people and vehicles in and around the school site. Signs are clearly displayed where fixed cameras operate. Images are normally kept for no longer than 30 days, unless required for an investigation.

What is your personal information used for?

- To safeguard pupils, staff, visitors and other stakeholders while on site
- To protect the school site, buildings and assets from crime, damage or misuse
- To deter, detect and support the investigation of incidents, including criminal activity
- To assist in identifying, apprehending and, where appropriate, prosecuting offenders
- To support health and safety management and ensure the safe operation of the school
- To assist in the effective day-to-day running of the school

What is the lawful basis we are relying on?

We process this information under Article 6(1)(e) UK GDPR, as processing is necessary for the performance of a task carried out in the public interest and the exercise of official authority.

Where has your personal information come from?

Images are captured when you are present in an area covered by CCTV.

Who will we share your personal information with?

Personal data may be shared securely with:

- relevant staff within the school
- the local authority
- the police

How long will we keep your information?

Images are normally kept for 30 days unless required for an investigation.

Your personal information and your rights

See the school's general privacy notice for information on individual rights.

Updates

This privacy notice may change from time to time.

If you have any questions or concerns about how we use your personal information, please contact the school office. You also have the right to complain to the Information Commissioner's Office if you are unhappy with how your data is processed.