



HALL MEADOW
PRIMARY SCHOOL



Hall Meadow Primary School

CCTV Policy

Reviewed by	Caroline Farmer (Headteacher)	April 2026
Next review date		April 2027

Hall Meadow Primary School is committed to ensuring the welfare and safety of all our children in school. We believe that pupils have a right to learn in a supportive, caring and safe environment which includes the right to protection from all types of abuse. All of our school policies and procedures reflect this priority.

Respect

Responsibility

Resilience

INCLUSION

INVOLVEMENT

INTEGRITY

INITIATIVE

INSPIRING

Contents

Introduction	3
Legal requirements	3
Responsibilities	3
Signage	4
Location of cameras	4
Viewing CCTV images.....	5
Storage and retention of CCTV images.....	5
Access to CCTV systems	6
Subject access requests	6
Access and disclosure of images to third parties	6
Complaints	7
Monitoring and review	7

Introduction

Hall Meadow Primary School has installed CCTV systems (both internally and externally) in premises for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external environs of the premises during both the daylight and night hours each day.

Legal requirements

Hall Meadow Primary School acknowledges that the use of CCTV is affected by statutory legislation. The *Protection of Freedoms Act 2012* includes guidance on the deployment and use of surveillance cameras in addition to *General Data Protection Regulation (GDPR)*, the *Human Rights Act 1998* and, on occasion, the *Regulation of Investigatory Powers Act 2000*. Hall Meadow Primary School will ensure that they are not in possible breach of these regulations.

Under the GDPR, Hall Meadow Primary School will record images using CCTV as part of the performance of a public task and to protect the vital interests of subjects; to keep children safe while they are in school and to maintain security. Data subjects are entitled to understand when and why their personal data is being processed, covering the transparency aspect of processing required by the law. It is recommended therefore that the use of CCTV is communicated via signage which indicates the areas covered and instructions for further information. It will also form an aspect of Privacy Notices. One of the core principles of the GDPR requires personal data to be processed for only as long as is required. Each camera and the reason it is in place will need to be assessed to determine how long footage can be retained for before secure destruction. It cannot be held indefinitely.

Responsibilities

Hall Meadow Primary School will appoint a Data Controller and inform the ICO. A Data Controller is “a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are or are to be processed”. If there are two or more parties involved, then all parties should be fully aware of their responsibilities and obligations.

Hall Meadow Primary School has a statutory requirement to notify the Information Commissioner’s Office (ICO) that CCTV is/will be installed and also to state clearly and precisely the purposes for which it is being employed, including the dissemination and distribution of all data collected. The ICO is the UK’s independent authority overseeing protection of personal information. Hall Meadow Primary School will have to renew the notification annually as well as inform the ICO within 28 days if any changes are made to the use of CCTV.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All employees are aware of the restrictions in relation to access to, and disclosure of recorded images.

Hall Meadow Primary School complies with the Surveillance Camera Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use.

The HEAD TEACHER will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the school.

- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy.
- Ensure that the CCTV monitoring is consistent with the highest standards and protections.
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.
- Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system.
- Ensure that monitoring recorded tapes are not duplicated for release.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally.
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place.
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy”.
- Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only.
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 31 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Headteacher.
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy.
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.
- Ensure that camera control is not infringing an individual’s reasonable expectation of privacy in public areas.

Signage

It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. Hall Meadow Primary School is to ensure that this requirement is fulfilled. The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purposes of using CCTV
- The name of the school
- The contact telephone number or address for enquiries

Location of cameras

The cameras are sited so that they only capture images relevant to the purposes for which they have been installed (as described above), and care will be taken to ensure that reasonable privacy expectations are not violated. Hall Meadow Primary School will ensure that the location of equipment is carefully considered to ensure that the images captured comply with the legislation.

Hall Meadow Primary School will make every effort to position the cameras so that their coverage is restricted to the school premises and covers outdoor areas.

CCTV will not be used in classrooms but in limited areas within Hall Meadow Primary School.

Members of staff will have access to details of where CCTV cameras are situated.

CCTV video monitoring and recording of public areas may include the following:

- Protection of school buildings and property: the building's perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services
- Monitoring of access control systems: monitor and record restricted access areas at entrances to buildings and other areas
- Video patrol of public areas: parking areas, main entrance/exit gates, traffic control
- Criminal investigations (carried out by the police): robbery, burglary and theft surveillance

Assist in the resolution of incidents occurring between pupils if/when required.

Viewing CCTV images

The initial viewing of live and recorded images of CCTV should be restricted to the Data Controller only. It may be appropriate to appoint and train a deputy to cover any absence, or if the Data Controller is not normally on site or otherwise not readily available. Special arrangements should be in place and published if for any reason the installation and control of the CCTV and images collected are under ultimate control of an outside agency, e.g. under a Private Finance Initiative arrangement.

Hall Meadow Primary School is aware that the outsourcing of any monitoring of surveillance CCTV could have serious implications. LA advice will always be sought in such situations. Hall Meadow Primary School policy contains clear information about the security of such images and access to them. Requests for access to images should be dealt with under the policy and decisions on such requests made by the Data Controller, who should have been fully trained in the use of the school's policy and the GDPR.

Any recorded images should be viewed in a restricted area such as an office, where content cannot be seen from the outside. If Hall Meadow Primary School has more than one person authorised to operate the CCTV system, it is imperative a mechanism is in place to allow for communication and transfer of information, ensuring that there is a consistent approach to managing access to the CCTV images.

Some security staff and those who have access to passive monitoring using approved, installed monitors should be able to view images from appropriate cameras. This may include networked CCTV systems using Internet Protocol (IP).

Storage and retention of CCTV images

Hall Meadow Primary School policy will also cover the retention of images taken by the CCTV cameras. The policy on retention of images should be in harmony with the Hall Meadow Primary School purposes in recording them. For example, if the objective of the CCTV is as a deterrent to vandalism, the policy should state that once images are viewed, and with no reports of vandalism, the images should be destroyed as soon as possible.

Hall Meadow Primary School should strive to keep images for the shortest period of time possible. It is absolutely paramount that images taken and stored before they are destroyed are secure and that nobody other than the Data Controller can access them.

If the CCTV system uses video or DVD recordings, the tapes/discs should be indexed, stored for the appropriate amount of time and wiped clean after that time expires, ready for reuse. If using hard drive technology, the Data Controller should be fully trained in its use and how to index, store and wipe clean, as well as to ensure that security measures are in place to prevent external sources accessing the footage. Where dissemination of data is possible, particularly with (hard drive) digital systems, it must be clear who is authorised to carry out such processing, the restrictions under which they operate and the limitations of what they are authorised to do.

For all data that is stored for possible future viewing, a register must be maintained, detailing relevant information such as date, time and length of the original recording, as well as the locations covered and groups or individuals recorded. Reviews of stored images should be regularly conducted, so that obsolete stored material can be deleted securely.

Access to CCTV systems

The Data Controller should also be trained in issues such as what to do if a request for the images is received from an outside source, most likely the police, who are able to make such an application for purposes of preventing or detecting crime. The procedure for dealing with such requests should be outlined in the Hall Meadow Primary School policy and made clear for all staff to see. In particular, the details of any data released to a third party should be formally recorded, to also include the date of the disclosure, to whom, reasons for the request and any other relevant information, such as a crime incident number.

Subject access requests

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the GDPR.

All requests should be made in writing to the Data Protection Officer via the Head Teacher who can be contacted by email hmps-admin@hmps.inmat.org.uk. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location.

In the event that Hall Meadow Primary School does not have a facility to provide copies of CCTV footage, the applicant may view the CCTV footage if available.

Hall Meadow Primary School will respond to requests within 30 days of receiving the request but if a request is received outside of the school term this may not be possible.

Hall Meadow Primary School reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

Access and disclosure of images to third parties

The Data Controller should also be trained in issues such as what to do if a request for the images is received from an outside source, most likely the police, who are able to make such an application for

purposes of preventing or detecting crime. The procedure for dealing with such requests is covered by the GDPR policy. In particular, the details of any data released to a third party should be formally recorded, to also include the date of the disclosure, to whom, reasons for the request and any other relevant information, such as a crime incident number.

There will be no disclosure of recorded data to third parties other than authorised personnel such as the police and service providers to Hall Meadow Primary School where these would reasonably need access to the data (e.g. investigators).

If an order is granted by a court for disclosure of CCTV images, then this should be complied with. However, very careful consideration will be given to exactly what the court order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

Requests for images should be made in writing to the Data Protection Officer. The data may be used within the Hall Meadow Primary School) discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

Complaints

Complaints about non-compliance with the GDPR can be made to the ICO. Hall Meadow Primary School is fully aware that failure to comply may lead to a criminal prosecution.

Monitoring and review

The Hall Meadow Primary School CCTV system should be constantly reviewed to monitor their effectiveness and impact on the school community. It is not acceptable for a school simply to install CCTV cameras and forget about the impact they may be having.

A policy of constant review is one way of demonstrating that the use of CCTV is only for specific purposes. Should cameras be present in classrooms, staff must remain confident that the system's use has not been extended, even inadvertently or casually, into any formal or informal process of performance management or capability procedures.

The Hall Meadow Primary School will monitor the implementation of the policy and check annually that Hall Meadow Primary School has registered with the Information Commissioner's Office.

The Headteacher and lead administrator will monitor the effectiveness of the policy and will report to the Local Academy Committee if there are any breaches or requests to view the CCTV.

The Local Academy Committee will review this policy at least every two years and assess its implementation and effectiveness. The policy will be promoted and implemented throughout the school.