



**Objective:**

This CCTV policy is designed to ensure the responsible use of CCTV systems to enhance safety, security, and safeguarding, while respecting privacy and complying with legal and regulatory requirements. It outlines the purpose, operation, and management of the system to protect individuals and property and ensure transparent, lawful, and proportionate monitoring practices.



## **CCTV Policy for Combe Pafford School (CPS)**

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## 1. Introduction

Combe Pafford School provides education and care for pupils with special needs, emphasizing safety and support. The use of CCTV is a crucial component of the school's safeguarding strategy, offering surveillance to deter and address incidents, protect individuals, and secure the premises.

This policy has been developed in accordance with:

- **Data Protection Act 2018 (DPA 2018)**
  - **General Data Protection Regulation (GDPR)**
  - **Protection of Freedoms Act 2012**
  - **Human Rights Act 1998**
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## 2. Aims of the CCTV System

The CCTV system at Combe Pafford School is operated to:

- Ensure the safety of pupils, staff, and visitors, particularly those with additional vulnerabilities.
- Support safeguarding practices by monitoring potential incidents and identifying risks.
- Protect school property and prevent theft, vandalism, and unauthorized access.
- Assist in the investigation of security breaches, accidents, or other incidents.
- Provide evidence for disciplinary or legal proceedings if necessary.

CCTV is not intended for monitoring staff or pupil performance or conduct unless explicitly required during an investigation following safeguarding concerns.

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## 3. Scope

This policy applies to:

- All CCTV cameras installed on Combe Pafford School premises.
- All staff, contractors, and visitors involved in accessing or managing the system.
- All data captured, stored, and processed through the CCTV system.

CCTV cameras are installed in public areas such as entrances, corridors, outdoor spaces, and car parks. Cameras are not installed in private areas such as toilets, changing rooms, or classrooms unless exceptional circumstances arise (e.g., safeguarding risks), and these would require prior consultation with relevant authorities and stakeholders.

## 4. Legal Framework and Compliance

The CCTV system operates in compliance with the following principles:

- **Lawfulness, Fairness, and Transparency:** Individuals are informed of the CCTV system's purpose through signage and other communications.
  - **Purpose Limitation:** Footage is used only for the purposes outlined in this policy.
  - **Data Minimization:** Cameras are positioned to capture relevant images without unnecessary intrusion into private spaces.
  - **Accuracy:** CCTV recordings are accurate and reviewed regularly.
  - **Storage Limitation:** Footage is retained for a specified period (typically 30 days) unless required for ongoing investigations.
  - **Security:** Access to footage is restricted and protected against unauthorized access.
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## 5. Management and Operation

- **System Management**
    - The CCTV system is owned and operated by Combe Pafford School.
    - The **Headteacher** and **Property Manager** oversee the operation and compliance of the system.
    - Regular maintenance ensures all equipment is functioning correctly.
  - **Signage**
  - Clear and visible signs are displayed throughout the premises to inform individuals of:
    - The use of CCTV recording.
    - The purpose of its use.
    - Contact details for further information.
    - Example displayed below
  - **Camera Placement**
  - Cameras are strategically located to maximize coverage of high-risk areas while minimizing intrusion.
  - Cameras are not placed in areas with a high expectation of privacy.
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## 6. Access and Disclosure

- **Access to Footage**
  - Only authorized personnel have access to CCTV footage:
    - Sally Banfield      Headteacher
    - Gregg Payne      Property Manager
    - Jane Clements      SBM
    - Jenny McVeigh      Deputy Head
    - Matt Davey      Lead Safeguard
  - Access is granted only for legitimate reasons, such as safeguarding investigations or legal requirements.

## Steps:

### 1 Incident occurs

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- An incident on the school grounds occurs in which CCTV should be reviewed.

### 2 Request for footage

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- A Request for footage should be emailed to the Headteacher / Property Manager
- The authorized personnel do not require permission to request footage
- All other staff should get approval (via email) from the Headteacher, Property Manager or SBM

### 3 Footage reviewed

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- Authorized Personnel to review footage on behalf of requester
- Authorized Personnel to show footage to requester (If deemed appropriate)

### 4 Footage released or stored

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- Footage can be released where deemed necessary, Register of CCTV releases to be kept on behalf of CPS
- Footage can be released to relevant authorities if approved (release added to register)

### 5 Footage deleted

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- Footage should be deleted when not required anymore. Once footage is deleted the CCTV release register should be updated on behalf of CPS
- **Disclosure** - CCTV footage may be disclosed to:
  - Law enforcement agencies when legally required.
  - Relevant parties in safeguarding or legal investigations (e.g., social services, solicitors).
  - Parents or guardians when their child is involved in an incident, subject to data protection rules.

Requests for access by external parties must be made in writing and are evaluated on a case-by-case basis, ensuring compliance with data protection laws.

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## 7. Data Retention

- CCTV recordings are retained for **30 days** unless required for ongoing investigations.
- After the retention period, footage is securely deleted or overwritten.

## 8. Safeguards and Privacy

The following measures are in place to protect privacy:

- **Data Protection Impact Assessments (DPIAs):** Conducted for new installations or changes to the system.

**Restricted Access:** Password-protected systems and logs of all access to footage.

- **Regular Audits:** Annual reviews ensure compliance with legal requirements and best practices.
- **Privacy Zones:** Cameras are configured to avoid unnecessary recording of private or neighbouring areas.

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## 9. Training

Staff with access to the CCTV system receive training on:

- Data protection laws and safeguarding requirements.
  - Appropriate use of footage and confidentiality.
  - Technical operation of the CCTV system.
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## 10. Complaints and Queries

Individuals who have concerns about the CCTV system or believe their rights have been infringed can:

1. Raise their concerns with the school's Headteacher or SBM.
  2. Lodge a complaint with the **Information Commissioner's Office (ICO)** if unsatisfied with the school's response.
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## 11. Policy Review

This policy is reviewed annually or in response to significant changes in legal or operational requirements. Stakeholder feedback, including from staff, parents, and governing bodies, is considered during reviews.

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## Approval and Acknowledgment

- Policy Approved by:
  - Last Reviewed: **27/11/2024**
  - Next Review Due: **26/11/2025**
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This policy reflects Combe Pafford School's commitment to safeguarding, security, and privacy. For further information, contact the school office.

Example of signage displayed:

