The Children First Learning Partnership

CCTV Code of Practice

(Version 3)

The CCTV Code Of Practice in respect of the Children First Learning Partnership has been discussed and adopted by the Directors Board	
Chair of Board:	*Mrs N Chell*
Responsible Officer:	*CEO – Mrs A Rourke*
Agreed and ratified by the Directors Board on:	*20.10.2025*
To be reviewed:	*April 2027*

Introduction

The Reginald Mitchell Primary School, Knypersley First School, Kingsfield First School, Oxhey First School, Castlechurch Primary School, Springhead Primary School and Marlfields Primary School use a closed circuit television (CCTV) system to reduce crime and to monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors.

The Reginald Mitchell Primary School and Knypersley First School systems comprise of a number of external and internal fixed and dome cameras that record uncontrolled images of reception areas, entrances, corridors, walk ways, car park, playgrounds and grounds.

Kingfield First School, Oxhey First School, Castlechurch Primary School and Marlfields Primary systems comprise of an internal fixed camera that records uncontrolled images of the reception area and external fixed and dome cameras that record uncontrolled images of walk ways, entrances, car park, playgrounds and grounds.

Springhead Primary School system comprise of a number of internal fixed and dome cameras that record uncontrolled images of the library and ICT suite and external fixed and dome cameras that record uncontrolled images of entrances, walk ways, car park, playgrounds and grounds.

The system does not record sound.

The system is owned and operated by the school with recordings held centrally on a computer or school can securely log in to the CCTV software from another school device. System access is determined by the school's leadership team and system administration is password controlled. A facility to monitor cameras is sited in the Office/Office Manager's room, with monitoring undertaken by the Headteacher / Executive Headteacher. Some site staff also have access to monitor CCTV remotely. Footage is monitored only by those with authorisation and for the purposes of achieving the objectives of the CCTV system as set out below. Those operating the system and those with access to images are aware of the procedures that need to be followed when accessing recorded images, including restrictions in relation to the access and disclosure of recorded images.

The procedures that need to be followed when accessing recorded images / live footage are the same across each school, footage should only be viewed by those authorised and in the event of a security incident or emergency and only when necessary.

The school's CCTV scheme is registered with the Information Commissioner under the terms of the Data Protection Act, which also covers the use of the CCTV images. This guidance outlines the school's use of the CCTV system and how it complies with the Act and all GDPR requirements.

Objectives

The objectives for the use of the CCTV system is to:

- assist in providing a safe and secure environment for the benefit of those pupils attending and visiting the school, for those who work and volunteer in the school, and for those who visit the school, such as members of an outside agency or contractors
- deter and detect anti-social behaviour and crime
- provide the Police, Health and Safety Executive and the School with evidence upon which to take criminal, civil and disciplinary action respectively

- protect employees from undue threats and violence
- obtain evidence for use in the investigation of criminal actions, breaches of health and safety legislation and breaches of pupil and staff disciplinary procedures

Note: The School will only investigate images for use in a staff disciplinary case when there is a suspicion of gross misconduct and not to generally monitor staff activity. In these situations the Headteacher / Executive Headteacher will approve their use. Where access is given, the confidentiality of these images and who is able to access them will be closely controlled.

Note: A member of the school leadership team will approve the use of images for matters of pupil discipline. Where access is given, the confidentiality of these images and who is able to access them will be closely controlled.

Statement of Intent

The School complies with data protection law and with the Surveillance Camera Code of Practice to ensure its surveillance systems are used responsibly and safeguards both trust and confidence in its continued use. The code of practice is published at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1035067/Surveillance_Camera_CoP_Accessible_PDF.pdf

The School is committed to complying with the requirements of the Data Protection Act and will operate the system in accordance with the eight data protection principles, being:

- personal data shall be processed fairly and lawfully
- personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes
- personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed
- personal data shall be accurate and, where necessary, kept up to date
- personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes
- personal data shall be processed in accordance with the rights of data subjects under this Act
- appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data
- personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data

CCTV warning signs are clearly and prominently placed throughout the school, internally and externally. Signs notify the use of CCTV, details of the purpose for using CCTV and contact details for enquiries.

All images produced by the system remain the property and copyright of the School.

Siting of Cameras

Cameras are sited so that they only capture images relevant to the purpose as described in the objectives. Care has been taken to ensure that reasonable privacy expectations are not violated and that images captured comply with the Data Protection Act.

The school has made effort to ensure that camera coverage is restricted to the school's premises and grounds.

CCTV is not installed in classrooms, toilets or staff rooms.

Storage, Retention and Access to CCTV recordings

Recorded data is not retained for longer than 28 days. Whilst retained, the integrity of the recordings is maintained by restricting access to authorised personnel and viewings are to be:

- in line with the above objectives for the use of the CCTV system
- logged itemising the date, time, camera, and persons viewing
- supported by an appropriate disclosure documentation when viewed by the Police which is to be filed for future reference
- not forwarded to the media for entertainment purposes or be placed on the internet
- not copied in any way, e.g. photographed, downloaded or printed for use other than described in the objectives
- only released to the media for identification purposes in liaison with the Police or other law enforcement agency
- secure to ensure they are only seen by the authorised recipient

Police Requests

CCTV footage requests from the police should be sent to the Headteacher for the applicable site. The Headteacher should ensure that a Police Request Form is completed before deciding to provide the footage. If the footage is likely to be of a sensitive nature or it is unclear whether the footage should be provided, they should consult with the schools DPO for advice. All police requests should be made in writing and be signed by a high-ranking officer using the form available from Staffordshire County Council Information Governance Officer.

Subject Access Requests (SAR)

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

All requests are to be made to the Headteacher / Executive Headteacher.
Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified, such as date, time and location.

The 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.

Complaints

Complaints about operation of the CCTV system should be directed to the Headteacher / Executive Headteacher.

Version Control:

Version	Date	Amendment	By
V2	18/04/2024	Added Kingfield First School, Oxhey First School, Castlechurch Primary School and Springhead Primary School to introduction (Page 2)	COO
V2	18/04/2024	Updated how schools can log in to view CCTV images (Page 2)	COO
V2	18/04/2024	Removed ICO CCTV code of practise as no longer available and added Surveillance Camera Code of Practice that was created by the Home Office under the Protection of Freedoms Act 2012 to further regulate CCTV. The commissioner encourages any organisation operating any kind of surveillance system to voluntarily adopt the code as best practice. (Page 3)	COO
V2	18/04/2024	Added section about police requests (Page 5)	COO
V2	18/04/2024	Date of review/ ratification changed to 01.05.2024 (Front cover)	COO
V3	15.10.2025	Wording added to introduction to ensure clarity on when CCTV can be checked. Some site staff also have access to monitor CCTV remotely. Footage is monitored only by those with authorisation and for the purposes of achieving the objectives of the CCTV system as set out below. The procedures that need to be followed when accessing recorded images / live footage are the same across each school, footage should only be viewed by those authorised and in the event of a security incident or emergency and only when necessary.	