PADNELL INFANT SCHOOL

BOARD OF GOVERNORS

CCTV POLICY

Name of Unit/Premises/Centre/School	Padnell Infant School
Date of Policy Review	March 2026
Date of Next Review	March 2028
Name of Headteacher	Mrs Mandy Grayson

Administration Record

Issue	Modification	Date
1	Full Governing Body Approval	March 2026

Contents

1. Introduction
2. Purposes of the CCTV Scheme
3. The guiding principles of the Surveillance Camera Code of Practice
4. Details about the CCTV system
5. Operation of the CCTV system (including location)
6. Signs and privacy notices
7. Storage and Retention
8. Staff training
9. Requests for CCTV footage
10. Review
11. Complaints and concerns
12. Related policies and procedures
13. Other sources of information

1. Introduction

This policy is to regulate the management, operation and use of the CCTV scheme at Padnell Infant School.

2. Purposes of the CCTV Scheme

The school's use of CCTV must only be for specified purposes which are in the pursuit of legitimate aims and are necessary to meet an identified pressing need. The specified purposes for the school's use of CCTV are:

For *security and safety reasons such as for the safety of staff, pupils and visitors and to protect school property and assets.*

3. The guiding principles of the Surveillance Camera Code of Practice

The school adopts the guiding principles in the Surveillance Camera Code of Practice which are as follows:

a) Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
b) The user of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
c) There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
d) There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
e) Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
f) No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
g) Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.

h) Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
i) Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
j) There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.
k) When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
l) Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

In addition, the school will ensure that its use of CCTV complies with data protection legislation (including the UK GDPR and the Data Protection Act 2018).

4. Details about the CCTV system

- The system comprises of a HikVision IDS-720-8HQ-Hi-K1-4S(B) device, 2 dome cameras (outside the front door and by the Year R door), and 1 fixed camera (on the entrance gates)
- The CCTV system will operate 24 hours each day, every day of the year
- The system does not have sound recording enabled
- The Site Manager will be responsible for the day-to-day operation of the system.
- The school's Data Protection Officer will be responsible for monitoring compliance with this policy.

5. Operation of the CCTV system (including location)

- The system used produces clear images and these images can easily be taken from the system when required
- The cameras have been sited so that they provide clear images
- The cameras have been positioned to avoid capturing the images of persons not visiting the school
- The location of cameras have been carefully considered. Cameras are restricted to only monitor areas required under the scheme. Cameras will not be positioned in areas where there is a particularly high expectation of privacy e.g. toilets and changing rooms.
- Recorded material will be stored in a way that maintains the integrity of images.

- Annual checks are carried out to ensure that the system is working properly and produces high quality images.
- Viewing of any live monitors must be restricted to the operator. Viewing of recorded images should take place in a private area to which only authorised staff have access to at the time of viewing.
- The images from the CCTV system are securely stored where only a limited number of authorised persons (Site Manager and Headteacher delegation) may have access to them
- Where cameras store data, the data stored is password protected in order to prevent viewing should any unauthorised removal/theft occur.

6. Signs and privacy notices

Individuals have the right to be informed about the use of their data including any CCTV images of them. The school will ensure that where cameras are in use clear signage is put in place so that members of the public and staff are aware that they are entering an area that is monitored by cameras. The school will ensure that the 7 signs are clearly visible and confirm that the school/Ellis Integrated Systems are responsible for the CCTV scheme, including contact.

The school's privacy notice which covers its use of CCTV can be found on our website: Padnell Infant School - Privacy Policy

7. Storage and Retention

The school will retain data for 30 days, after which it will be automatically recorded over, unless specific footage needs to be retained for longer—for example, for the purposes of an ongoing investigation.

All data will be stored securely throughout the retention period. Any data retained beyond 30 days for legitimate reasons will also be secured appropriately. At the end of the retention period, data will be permanently and securely erased through the overwrite process.

8. Staff training

The Site Manager using camera systems will have appropriate training. They will be trained in their responsibilities under this policy and related policies and procedures and should be aware of the security and disclosure procedures for the scheme and the rights of individuals regarding their recorded images.

9. Requests for CCTV footage

(a) Data subject requests

Individuals have certain legal rights in respect of their personal data including their CCTV images. The rights that will be most relevant to CCTV use will be:

- **Right of access** (i.e. data subject wishes to access their CCTV images)
- **Right to object** (i.e. data subject objects to the use of CCTV capturing their image)
- **Right to be forgotten** (i.e. data subject wishes to have their CCTV footage erased)

Any data subject requests in respect of CCTV footage, will be dealt with in accordance with the school's data subject requests process details of which can be found in our: Data Protection Policy March 2026

(b) Freedom of Information requests

As the school is a public authority for the purposes of the Freedom of Information Act 2000 it may receive FOI requests for CCTV footage. The school will deal with any FOI requests concerning CCTV in accordance with its FOI procedure.

10. Review

This policy shall be reviewed every two years and updated as required. The school's use of CCTV will be reviewed along with the policy review.

11. Complaints and concerns

Any complaints or concerns about the school's use of CCTV should be sent to: Nikki Thundercliffe, Data Protection, Officer. Tel: 02392 263784 Email: admin@padnell-inf.hants.sch.uk

12. Related policies and procedures

Freedom of Information policy

Data Protection Policy (Including Subject Access Requests)

General privacy notice