Villa Real School

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CCTV Policy

Responsibility: Andrew Moore

Date: November 2026

Date to be reviewed: November 2028

Statement of intent

At Villa Real, we take our responsibility towards the safety of staff, visitors and pupils/students very seriously. To that end, we use CCTV cameras for the prevention and detection of crime.

The purpose of this policy is to manage and regulate the use of the CCTV systems at the school and ensure that:

- We comply with the General Data Protection Regulation (GDPR)
- The images that are captured are useable for the purposes we require them for
- We reassure those persons whose images are being captured, that the images are being handled in accordance with GDPR

This policy covers the use of CCTV systems which capture moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes:

- Observing what an individual is doing
- Taking action to prevent a crime
- Using images of individuals that could affect their privacy

Legal framework

This policy has due regard to legislation and statutory guidance, including, but not limited to the following:

The Human Rights Act 1998 (HRA)

The Regulation of Investigatory Powers Act 2000

The Protection of Freedoms Act 2012 and the Surveillance Camera Code of Practice issued under the Protection of Freedoms Act (POFA code).

The General Data Protection Regulation (GDPR) 2016

Data protection Act 2018

The Freedom of Information Act 2000

The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)

The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004

The School Standards and Framework Act 1998

The Children Act 1989

The Children Act 2004

The Equality Act 2010

Definitions

For the purpose of this policy a set of definitions will be outlined, in accordance with the surveillance code of conduct:

- Surveillance – monitoring the movements and behaviour of individuals; this can include video, audio or live footage. For the purpose of this policy only video footage will be applicable.
- Overt surveillance – any use of surveillance for which authority does not fall under the Regulation of Investigatory Powers Act 2000. Any overt surveillance footage will be clearly signposted around the school.
- Covert surveillance – any use of surveillance which is intentionally not shared with the subjects it is recording. Subjects will not be informed of such surveillance. Villa Real does not condone the use of covert surveillance when monitoring the school's staff, pupils and/or volunteers. Covert surveillance will only be operable in extreme circumstances and with legal advice.

Roles and responsibilities

The role of the Data Protection Officer (DPO), Andrew Moore, includes:

- Dealing with freedom of information requests and subject access requests (SAR) in line with legislation, including the Freedom of Information Act 2000.
- Ensuring that all data controllers at the school handle and process CCTV footage in accordance with data protection legislation.
- Ensuring that CCTV footage is obtained in line with legal requirements.
- Ensuring that CCTV footage is destroyed in line with legal requirements when it falls outside of its retention period.
- Keeping comprehensive and accurate records of all data processing activities, including CCTV footage, detailing the purpose of the activity and making these records public upon request.
- Informing data subjects of how their data captured in CCTV footage will be used by the school, their rights for the data to be destroyed and the measures implemented by the school to protect individuals' personal information.
- Preparing reports and management information on the school's level of risk related to data protection and processing performance.

- Reporting to the highest management level of the school, e.g. the governing body.
- Abiding by confidentiality requirements in relation to the duties undertaken while in the role.
- Monitoring the performance of the school's privacy impact assessment (PIA), and under the GDPR the data protection impact assessment (DPIA), and providing advice where requested.

Villa Real, as the corporate body, is the data controller. The governing body of Villa Real therefore has overall responsibility for ensuring that records are maintained, including security and access arrangements in accordance with regulations.

The role of the Data Controller, Jean Allen, includes:

- Processing CCTV footage legally and fairly.
- Collecting CCTV footage for legitimate reasons and ensuring that it is used accordingly.
- Collecting CCTV footage that is relevant, adequate and not excessive in relation to the reason for its collection.
- Ensuring that any CCTV footage identifying an individual is not kept for longer than is necessary.
- Protecting footage containing personal data against accidental, unlawful destruction, alteration and disclosure – especially when processing over networks.

The role of the Headteacher includes:

- Meeting with the DPO to decide where CCTV is needed to justify its means.
- Conferring with the DPO with regard to the lawful processing of CCTV footage.
- Reviewing the CCTV Policy to ensure it is compliant with current legislation.
- Monitoring legislation to ensure the school is using CCTV fairly and lawfully.
- Communicating any changes to legislation with all members of staff.

Purpose and justification

The school will only use CCTV cameras for the safety and security of the school and its staff, pupils/students and visitors. CCTV will be used as a deterrent for violent behaviour and damage to the school. The school will

only conduct surveillance as a deterrent and under no circumstances will the CCTV cameras be present in school classrooms or any changing facility.

The data protection principles

Data collected from CCTV will be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up-to-date; every reasonable step will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods, insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Objectives

The CCTV system will be used to:

- Maintain a safe environment.
- Ensure the welfare of pupils/students, staff and visitors.
- Deter criminal acts against persons and property.
- Assist the police in identifying persons who have committed an offence.

Protocols

The CCTV system will be registered with the ICO in line with data protection legislation.

The CCTV system is a closed digital system which does not record audio.

Warning signs have been placed throughout the premises where the CCTV system is active, as mandated by the ICO's Code of Practice.

The CCTV system has been designed for maximum effectiveness and efficiency; however, the school cannot guarantee that every incident will be detected or covered and 'blind spots' may exist.

The CCTV system will not be trained on individuals unless an immediate response to an incident is required.

The CCTV system will not be trained on private vehicles or property outside the perimeter of the school.

Security

Access to the CCTV system, software and data will be strictly limited to authorised operators and will be password protected.

The school's authorised CCTV system operators are:

Jill Bowe, Jean Allen, Andrew Moore.

The main control facility is kept secure and locked when not in use. If, in exceptional circumstances, covert surveillance is planned, or has taken place, copies of the Home Office's authorisation forms will be completed and retained. CCTV systems will be tested for security flaws once a month to ensure that they are being properly maintained at all times. CCTV systems will not be intrusive. The Head Teacher, DPO and SBM will decide when to record footage, e.g. a continuous loop outside the school grounds to deter intruders. Any unnecessary footage captured will be securely deleted from the school system. Any cameras that present faults will be repaired immediately as to avoid any risk of a data breach.

Code of practice

The school understands that recording images of identifiable individuals constitutes as processing personal information, so it is done in line with data protection principles. The school notifies all pupils/students, staff and visitors of the purpose for collecting CCTV data via notice boards, letters and emails. CCTV cameras are only placed where they do not intrude on anyone's

privacy and are necessary to fulfil their purpose. All CCTV footage will be kept for one month for security purposes; the Network Manager/DPO is responsible for keeping the records secure and allowing access, reporting to the Head Teacher.

The school has a CCTV system for the purpose of the prevention and detection of crime and the promotion of the health, safety and welfare of staff, pupils/students and visitors. The CCTV system is owned by the school and images from the system are strictly controlled and monitored by authorised personnel only.

The school will ensure that the CCTV system is used to create a safer environment for staff, pupils/students and visitors to the school, and to ensure that its operation is consistent with the obligations outlined in data protection legislation. The policy is available from the school's website.

The CCTV system will:

- Be designed to consider its effect on individuals and their privacy and personal data.
- Be transparent and include a contact point, the DPO, through which people can access information and submit complaints.
- Have clear responsibility and accountability procedures for images and information collected, held and used.
- Have defined policies and procedures in place which are communicated throughout the school.
- Only keep images and information for as long as required.
- Restrict access to retained images and information with clear rules on who can gain access.
- Consider all operational, technical and competency standards, relevant to the CCTV system and its purpose, and work to meet and maintain those standards in accordance with the law.
- Be subject to stringent security measures to safeguard against unauthorised access.
- Be regularly reviewed and audited to ensure that policies and standards are maintained.
- Only be used for the purposes for which it is intended, including supporting public safety, the protection of pupils, staff and volunteers, and law enforcement.

Access

Under the GDPR, individuals have the right to obtain confirmation that their personal information is being processed.

All images belong to, and remain the property of, the school.

Individuals have the right to submit an SAR to gain access to their personal data in order to verify the lawfulness of the processing.

The school will verify the identity of the person making the request before any information is supplied.

A copy of the information will be supplied to the individual free of charge; however, the school may impose a 'reasonable fee' to comply with requests for further copies of the same information.

Where an SAR has been made electronically, the information will be provided in a commonly used electronic format.

Requests by persons outside the school for viewing or copying disks, or obtaining digital recordings (for example the police), will be assessed by the Headteacher, who will consult the DPO, on a case-by-case basis with close regard to data protection and freedom of information legislation.

Where a request is manifestly unfounded, excessive or repetitive, a reasonable fee will be charged.

All fees will be based on the administrative cost of providing the information.

All requests will be responded to under the SAR policy.

In the event that a large quantity of information is being processed about an individual, the school will ask the individual to specify the information the request is in relation to.

It is important that access to, and disclosure of, the images recorded by CCTV footage is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact, should the images be required for evidential purposes.

Releasing the recorded images to third parties will be permitted only in the following limited and prescribed circumstances, and to the extent required or permitted by law:

- The police – where the images recorded would assist in a specific criminal inquiry
- Prosecution agencies – such as the Crown Prosecution Service (CPS)
- Relevant legal representatives – such as lawyers and barristers
- Persons who have been recorded and whose images have been retained where disclosure is required by virtue of data protection legislation and the Freedom of Information Act 2000

Requests for access or disclosure will be recorded and the Headteacher will make the final decision as to whether recorded images may be released to persons other than the police.

Monitoring and review

The Headteacher will be responsible for monitoring any changes to legislation that may affect this policy, and make the appropriate changes accordingly.

The Headteacher will communicate changes to this policy to all members of staff.

Location

There are currently 11 cameras situated across the school, both externally and internally. These cover the main areas of the school including the car park, the hall and internal corridors. No internal views of offices are covered. The following table shows each camera location:

Camera 1	External camera covering the container
Camera 2	External camera covering the car park including the front car park entrance
Camera 3	External camera covering the car park including the car park exit
Camera 4	External camera coving the car park area where the school mini-buses are parked
Camera 5	Internal camera covering the hall
Camera 6	Internal camera covering the corridor leading to the hall and the main entrance doors from the front reception area
Camera 7	Internal camera covering the main corridor, specifically the medical room and stock cupboard
Camera 8	Internal camera covering the main corridor, specifically Extended Services, stock cupboard and entrance to SBM office
Camera 9	Internal camera covering the entrance to the staff room/PPA room corridor, fire exit and CE2 class
Camera 10	Internal camera covering the main corridor where it forks outside P2/EYFSA, looking down the main corridor to the exit door
Camera 11	Internal camera covering the corridor down to CE1 class and the exit door to P1A class