

# The Friary School



## CCTV POLICY

### Introduction

The objective of this policy is to outline the circumstances within which the use of CCTV at The Friary School will be governed.

The policy has been prepared using the CCTV Code of Conduct published by the Information Commissioner's Office (ICO) and is referenced in our Data Protection / GDPR Policy.

In working within the ICO code it is intended that effective safeguards are in place to maintain the trust and confidence of members of the school community.

### Scope of CCTV

The images and information derived from the use of CCTV are covered by the Data Protection Act (DPA).

The policy covers the following use of images:

- Seeing what an individual is doing, for example monitoring them in a corridor.
- In appropriate circumstance taking action in relation to an individual, for example handing images to the police to investigate a crime.

CCTV will not routinely be used to monitor members of staff at work, although there may be exceptional circumstances where this is appropriate. Further information regarding monitoring staff can be found on the ICO website ([www.ico.org.uk](http://www.ico.org.uk)).

The Friary school uses CCTV to ensure the health, safety and welfare of students and staff, and to protect school property and buildings. CCTV will be used to:

- Monitor the movement of people around school (where individuals need to be recognised).
- Detect the presence of people in certain areas of the site.
- Recognise known individuals and determine people who are unknown.
- Identify people beyond reasonable doubt.

### Operation and Administration of CCTV

Cameras will be positioned having regard to the following considerations:

- As a deterrent to groups of students gathering in restricted areas and times
- As a means of preventing damage to the fabric of the school
- To reassure members of the school community
- Where, for those being monitored, intrusion can be minimised.
- Where the use of CCTV is proportionate to the problems regarding health, safety, and welfare of the school community.

The School Manager has responsibility for the effective control and administration of CCTV images.

The Senior Leadership Team (SLT) will determine how the images are used, who will be allowed to view images and when and to whom the images shall be disclosed.

## **Storage of CCTV Images**

Footage will be retained for 30 days. At the end of the retention period, the files will be overwritten automatically.

On occasion footage may be retained for longer than 30 days, for example where a law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation.

Recordings will be downloaded and encrypted, so that the data will be secure and its integrity maintained, so that it can be used as evidence if required.

## **Viewing CCTV Images**

Images shall only be viewed by SLT or by members of school staff as determined by SLT. Images shall only be viewed in a secure area where only those intended to have access have sight of the images.

## **Record of Use of Recorded Images**

From time to time, it is necessary to view and upload images taken from the CCTV. Usually, the use of images will be to support an investigation into an act of vandalism, issues in respect of students and staff health & safety or a criminal act. These recordings have restricted staff access as determined by SLT. The images will be erased once the investigation is concluded or other bona fide use as approved by the headteacher.

## **Third-Party Access**

CCTV footage will only be shared with a third party to further the aims of the CCTV system.

Footage will only ever be shared with authorised personnel such as law enforcement agencies or other service providers who reasonably need access to the footage (e.g. investigators).

All requests for access should be set out in writing and sent to the Headteacher or members of SLT in the Headteacher's absence.

The school will comply with any court orders that grant access to the CCTV footage. The school will provide the courts with the footage they need without giving them unrestricted access. The DPO will consider very carefully how much footage to disclose and seek legal advice if necessary.

The DPO will ensure that any disclosures that are made are done in compliance with the UK GDPR.

All disclosures will be recorded by the school and the Trust DPO notified.

## **Subject access requests (SAR)**

According to the UK GDPR and Data Protection Act 2018, individuals have the right to request a copy of any CCTV footage of themselves.

Upon receiving SAR, the school will immediately issue a receipt and will then respond within 1 calendar month.

When a SAR is received staff should inform the Trust DPO. When making a request, individuals should provide the school with reasonable information such as the date, time, and location the footage was taken to aid school staff in locating the footage.

On occasion the school will reserve the right to refuse a SAR, if, for example, the release of the footage to the subject would prejudice an ongoing investigation.

Images that may identify other individuals need to be obscured to prevent unwarranted identification. The school will attempt to conceal their identities by blurring out their faces, or redacting parts of the footage. If this is not possible the school will seek their consent before releasing the footage. If consent is not forthcoming the still images may be released instead.

The school reserves the right to charge a reasonable fee to cover the administrative costs of complying with a SAR that is repetitive, unfounded, or excessive.

Footage that is disclosed in a SAR will be disclosed securely to ensure only the intended recipient has access to it.

Records will be kept that show the date of the disclosure, details of who was provided with the information (the name of the person and the organisation they represent), and why they required it.

Individuals wishing to make an SAR can find more information about their rights, the process of making a request, and what to do if they are dissatisfied with the response to the request on the [ICO website](#)

### **Signage**

Clear and prominent signs will be in place around the school site so that those using the school are aware of the use of CCTV at Friary school. Signage should be in place in all areas where CCTV is installed.

### **Review of Procedures**

On an annual basis the use of CCTV will be reviewed and compliance with ICO guidance checked. A checklist (see Appendix 1) will be retained for reference and used as an initial benchmark for future reviews.

## APPENDIX 1 - ANNUAL CHECK-LIST

This CCTV system and the images produced by it are controlled by the School Manager who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998).

The Friary School have considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of students, staff, and other visitors to the school. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

|                                                                                                                                                                                                      | Checked / Date | By | Date of Next Review |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|----|---------------------|
| Notification has been submitted to the Information Commissioner and the next renewal date recorded.                                                                                                  | March 2026     | HT | Sept 2027           |
| There is a named individual who is responsible for the operation of the system                                                                                                                       | March 2026     | HT | Sept 2027           |
| A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required. | March 2026     | HT | Sept 2027           |
| Cameras have been sited so that they provide clear images                                                                                                                                            | March 2026     | HT | Sept 2027           |
| Cameras have been positioned to avoid capturing the images of persons not visiting the premises.                                                                                                     | March 2026     | HT | Sept 2027           |
| There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the signs                                      | March 2026     | HT | Sept 2027           |
| Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.                                                                         | March 2026     | HT | Sept 2027           |

March 2026

|                    |                |                                |               |                    |          |
|--------------------|----------------|--------------------------------|---------------|--------------------|----------|
| <b>Reviewed By</b> | Full Governors | <b>Implementation<br/>Date</b> | March<br>2026 | <b>Review Date</b> | Nov 2027 |
|--------------------|----------------|--------------------------------|---------------|--------------------|----------|