

CCTV Policy

Date: February 2026

Review Date: February 2028



Larkspur
Community Primary School

1. Introduction

We have in place a CCTV surveillance system. This policy details the purpose, use and management of the CCTV system and details the procedures to be followed in order to ensure that we comply with relevant legislation and the current Information Commissioner's Office Code of Practice.

We will have due regard to the Data Protection Act 2018, the General Data Protection Regulation (GDPR) and any subsequent data protection legislation, and to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998. Although not a relevant authority, we will also have due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012 and in particular the 12 guiding principles contained therein.

This policy is based upon guidance issued by the Information Commissioner's Office, 'In the picture: A data protection code of practice for surveillance cameras and personal information' ("the Information Commissioner's Guidance").

This policy and the procedures therein detailed apply to all of our CCTV systems including Automatic Number Plate Recognition ("ANPR") Licence Plate Recognition Cameras ("LPR"), webcams, covert installations and any other system capturing images of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are monitored and recorded in strict accordance with this policy.

2. CCTV System overview

The CCTV system is owned by Larkspur Primary School and managed by us. Under the Data Protection Act 2018, we are the 'Data Controller' for the images produced by the CCTV system. We are registered with the Information Commissioner's Office and our registration number is Z7316438. The CCTV system operates to meet the requirements of the Data Protection Act and the Information Commissioner's Guidance.

The Head Teacher is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.

The CCTV system operates across our entire premises. We have 13 cameras. Cameras are sited to ensure that they cover our premises only as far as is possible.

Further information regarding the number and location of CCTV cameras is available at: School Office, Larkspur Primary School, 0191 4875628.

Signs are placed at the main entrance and the corners of the main building in order to inform staff, students, visitors and members of the public that CCTV is in operation. The signage indicates that the system is managed by us and provides a contact number. The site manager is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.

The CCTV system is operational and is capable of being recording for 24 hours a day, every day of the year.

Any proposed new CCTV installation is subject to a Data Protection Impact Assessment

3. Purposes of the CCTV system

The principal purposes of our CCTV system are:

- for the prevention, reduction, detection and investigation of crime and other incidents;
- to ensure the safety of staff, students and visitors;
- to assist in the investigation of suspected breaches of our policies and procedures by staff or students

The CCTV system will be used to observe our premises in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed. We will always seek to operate our CCTV system in a manner that is consistent with respect for an individual's privacy.

4. Monitoring and Recording

Cameras are monitored in the school office, which is a secure area.

Images are recorded centrally on servers located securely in the school and are viewable in the school office. Additional staff may be authorised by the Head Teacher to monitor cameras sited within their own areas of responsibility on a view only basis.

The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked regularly to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.

Our use of covert cameras will be restricted to rare occasions, when a series of criminal acts have taken place within a particular area that is not otherwise fitted with CCTV. Covert recording will only take place if informing the individual(s) concerned would seriously prejudice the reason for making the recording and where there is reasonable grounds to suspect that illegal or unauthorised activity is taking place. All such monitoring will be fully documented and will only take place for a limited and reasonable period.

5. Compliance with Data Protection Legislation

In our administration of our CCTV system, we comply with the General Data Protection Regulation and the Data Protection Act 2018 and due regard is given to the data protection principles embodied within these. These principles require that personal data shall be:

- 1) processed lawfully, fairly and in a transparent manner;
- 2) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- 3) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- 4) accurate and, where necessary, kept up to date;
- 5) kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed; and
- 6) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

6. Applications for disclosure of images

Applications by individual data subjects

Requests by individual data subjects for images relating to themselves "Subject Access Request" should be submitted in writing together with proof of identification. In order to locate the images on the CCTV system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

Where we are unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, we are not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

Access to and disclosure of images to third parties

A request for images made by a third party should be made in writing to Jayne Hooker, Business Manager, Larkspur Primary School. We will consult with our Data Protection Officer (Gateshead Council) in relation to any request received from a third-party organisation, including the police.

In limited circumstances, it may be appropriate for us to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation. Such disclosures will be made at the discretion of the Head Teacher, with reference to relevant legislation and where necessary, following advice from our Data Protection Officer

Where a suspicion of staff misconduct arises, the Head Teacher may provide access to CCTV images for use in staff disciplinary cases. The Head Teacher may also provide access to CCTV images to relevant internal parties (such as other staff) when sought as evidence in relation to student discipline cases.

A record of any disclosure made under this policy will be held using the CCTV Access Log and will itemise the date, time, requestor, authoriser and reason for the disclosure.

7. Retention of images

CCTV images will be retained for no longer than 30 days from the date of recording. Images will be automatically overwritten after this point unless we are notified prior to this date that the images are required for evidential purposes, the investigation of an offence or as required by law. Where an image is required to be held in excess of the retention period referred to above, the Head Teacher will be responsible for authorising such a request.

Images held in excess of their retention period will be reviewed on a three-monthly basis and any not required for evidential purposes will be deleted.

8. Monitoring Compliance

All staff involved in the operation of our CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.

All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake appropriate data protection training.

9. Policy review

Our use of CCTV and the content of this policy shall be reviewed annually with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.