



CCTV AND SURVEILLANCE POLICY

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Other relevant policies:

Health and safety policy

Online Safety policy

Filming and Photography policy

Data protection policy

Privacy notices

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1. Aims

The surveillance system will be used to:

- Maintain a safe environment
- Ensure the welfare of pupils, staff, volunteers and visitors
- Protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public
- Support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders
- Promote good safeguarding practice

2. Purpose

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) system at Abbey School ("the School") to ensure that:

- We comply with the UK 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 data protection legislation

It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the School and members of the public) regarding their rights in relation to personal data recorded via the CCTV system ("the System").

The System is administered and managed by the School, who act as the Data Controller. This policy will be subject to review from time to time and should be read with reference to the School's Data Protection Policy and Privacy Notices.

The school will only use surveillance cameras for the safety and security of the school and its staff, pupils and visitors.

If the surveillance and CCTV systems fulfil their purpose and are no longer required, the school will deactivate them.

External coverage of the properties covers the gardens and access points to the rear of the property along with a front view of the main side gate. This policy seeks to promote an individual's rights and respect their dignity in line with GDPR guidelines

3. Legislation and guidance

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

- The UK General Data Protection Regulation (GDPR)
- [Regulation of Investigatory Powers Act 2000](#)
- [The Freedom of Information Act 2000](#)
- [The Data Protection Act 2018](#)
- [The Protection of Freedoms Act 2012](#)
- [Children Act 1989](#)
- [Children Act 2004](#)
- [Equality Act 2010](#)

This policy has been created with regard to the following statutory and non-statutory guidance:

- [ICO \(2017\) "In the picture: A data protection code of practice for surveillance cameras and personal information"](#)
- [Home Office \(2021\) "The Surveillance Camera Code of Practice"](#)
- [ICO \(2021\) Guide to the UK General Data Protection Regulation \(UK GDPR\)](#)

4. Definitions

“Surveillance” – monitoring the movements and behaviour of individuals; this can include video, audio or live footage.

“SAR” – subject access request

“Overt surveillance” – any use of surveillance which is clearly visible and signposted around the school for which authority does not fall under the Regulation of Investigatory Powers Act 2000

“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.

Abbey School 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

5. Responsibilities

5.1. Principal

The role of the Principal includes:

- Meeting with the data protection leads to decide where CCTV is needed to justify its means
- Conferring with the data protection leads with regard to the lawful processing of the surveillance and CCTV footage
- Reviewing the CCTV and Surveillance policy to ensure it is compliant with current legislation
- Monitoring legislation to ensure the school is using surveillance fairly and lawfully
- Communicating any changes in legislation with all members of staff

5.2. Data Protection Officer (DPO)

The role includes:

- Dealing with freedom of information requests and SARs in line with legislation, including the Freedom of Information Act 2000
- Ensuring that all data controllers at the school handle and process surveillance and CCTV footage in accordance with data protection legislation
- Ensuring that surveillance and CCTV footage is obtained in line with legal requirements
- Ensuring consent is clear, positive and unambiguous
- Ensuring that surveillance and CCTV footage is destroyed in line with legal requirements when it falls outside of the retention period
- Keeping comprehensive and accurate records of all data processing activities, including surveillance and CCTV footage, detailing the purpose of the activity and making these records public on request
- Informing data subjects of how their data captured in surveillance and 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 individual’s personal information
- Preparing reports and management information on the school’s level of risk related to data protection and processing performance
- Abiding by confidentiality requirements in relation to the duties undertaken while in the role
- Monitoring the performance of the school’s data protection impact assessment (DPIA) and providing advice where requested

5.3. Data Protection Leads

The School Business Manager (SBM) and IT Manager act as the Data Protection Leads in the school and deal with the day-to-day matters relating to data protection and, therefore, for the benefit of this policy act as the data controller.

The role of the data controller includes:

- Processing surveillance and CCTV footage legally and fairly.
- Collecting surveillance and CCTV footage for legitimate reasons and ensuring that it is used accordingly.
- Collecting surveillance and CCTV footage that is relevant, adequate and not excessive in relation to the reason for its collection.
- Ensuring that any surveillance and 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

6. Data protection

Data collected from surveillance and CCTV will be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified and legitimate purposes – data will not be processed further in a manner that is incompatible with the following purposes:
- Further processing for archiving data in the public interest
- Scientific or historical research
- Statistical 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 is inaccurate, having regard to the purposes for which they are processed, is 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 is processed.
- 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

The school will ensure that the installation of surveillance and CCTV systems will always justify its means

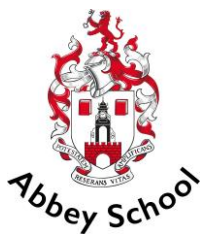
Surveillance and CCTV systems will not be intrusive. Pupils, staff and visitors will be made aware of the following:

- Whenever they are being monitored by a surveillance camera system
- Who is undertaking the activity
- The purpose for which the associated information is being used.

All cameras are owned and monitored within the school Abbey School and none are remotely operable.

7. Protocols

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



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

The surveillance 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 surveillance system will not be trained on individuals, private vehicles or property outside the perimeter of the school except for the side gate to Abbey Green for the purposes of identification and security.

8. Location of cameras

CCTV systems are installed internally and externally on site. Their positions ensure they only capture images relevant to the purposes for which they have been installed and care is taken to ensure that reasonable privacy expectations are not violated.

There are:

- 16 cameras located in 10-11 Abbey Square ([Appendix 1](#))
- 6 cameras located in 8 Abbey Square (Appendix 2)
- 24 cameras across 3 floors in 3-6 Abbey Green (Appendix 3)

The School makes every effort to position the cameras so that their coverage is restricted to the school premises.

8.1. Classroom CCTV

Live-stream surveillance cameras are used in classrooms and group rooms within the School that have been identified as not being easily monitored due to lack of vision panels in the doors. These cameras give a live-feed only and do not record data. However, the cameras can be activated to record data at the discretion of the school in the event of monitoring and evaluation needs for behaviour or clinical observations. If the decision is made to record then staff would be informed.

9. Operation of the system

The CCTV will be managed by the Principal and Senior Leadership Team ("SLT").

Checks will be made each morning to ensure that all cameras are functioning and make appropriate arrangements for changing classrooms if there are any malfunctions.

Access to viewing of CCTV images is limited to staff who are responsible for the security and safeguarding of the school. Access is via logging in to the operating system by secure username and password and controlled by the IT Manager. The school's authorised CCTB system operators are:

- IT Manager
- Principal
- School Business Manager
- Premises Manager

Live streams of classrooms with no vision panels in the doors are accessible by the screen fixed next to the classroom door and visible to anyone walking past.

Live-stream monitors may be turned off or covered when pupils are not present to maintain the privacy of individuals.

Transmitted CCTV images of all entrances to the school are live-streamed to the visual display monitor located in the main school office for access security reasons.

The Principal will decide when to record footage following advice taken from the DPO. 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 data breach.

10. Storage and retention of CCV images

Information is held on the Network Video Recorder hard drive; this will be automatically erased as soon as practicable. Ingest data is kept for 18 to 30 days (school motion recording activity dependent). Manual backup of data is completed when required on the Network Video Recorder. Access will be restricted to authorised personnel. The Principal and Data Controller are responsible for keeping the records secure and allowing access. The Principal may delegate the administration of the CCTV system to another senior staff member.

In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

11. Access

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

All disks containing 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.

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 without delay and at the latest, within one month of receipt. In the event of numerous or complex requests, the period of compliance will be extended by a further two months. The individual will be informed of this extension and will receive an explanation of why the extension is necessary, within one month of the receipt of the request.

Access to recorded footage is via the CCTV monitoring applications and backed up to a Network Attached Storage device located in 12 Abbey Square. Access to the system and recordings is limited to the named system operators (see [Section 10](#))

All hardware and data is within the Abbey School local network and steps have been taken to ensure the physical security by locating it in a locked cabinet; security on the network has been ensured by segregating access over multiple VLANs with only required access being granted.

12. Code of practice

The School understands that recording of images of identifiable individuals constitutes as processing personal information, so it is done in line with data protection principles.

CCTV cameras are only placed where they do not intrude on anyone’s privacy and are necessary to fulfil their purpose. The surveillance system is for the purpose of prevention and detection of crime and the promotion of the health, safety and welfare of staff, pupils and visitors.

The surveillance and CCTV system is owned by the school and images from the system are strictly controlled and monitored by authorised personnel only.

The school ensures that the surveillance and CCTV system is used to create a safer environment for staff, pupils 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.

The surveillance and CCTV system will:

- Be designed to take into account 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 surveillance and 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 law enforcement
- Be accurate and well maintained to ensure information is up to date

13. Monitoring and review

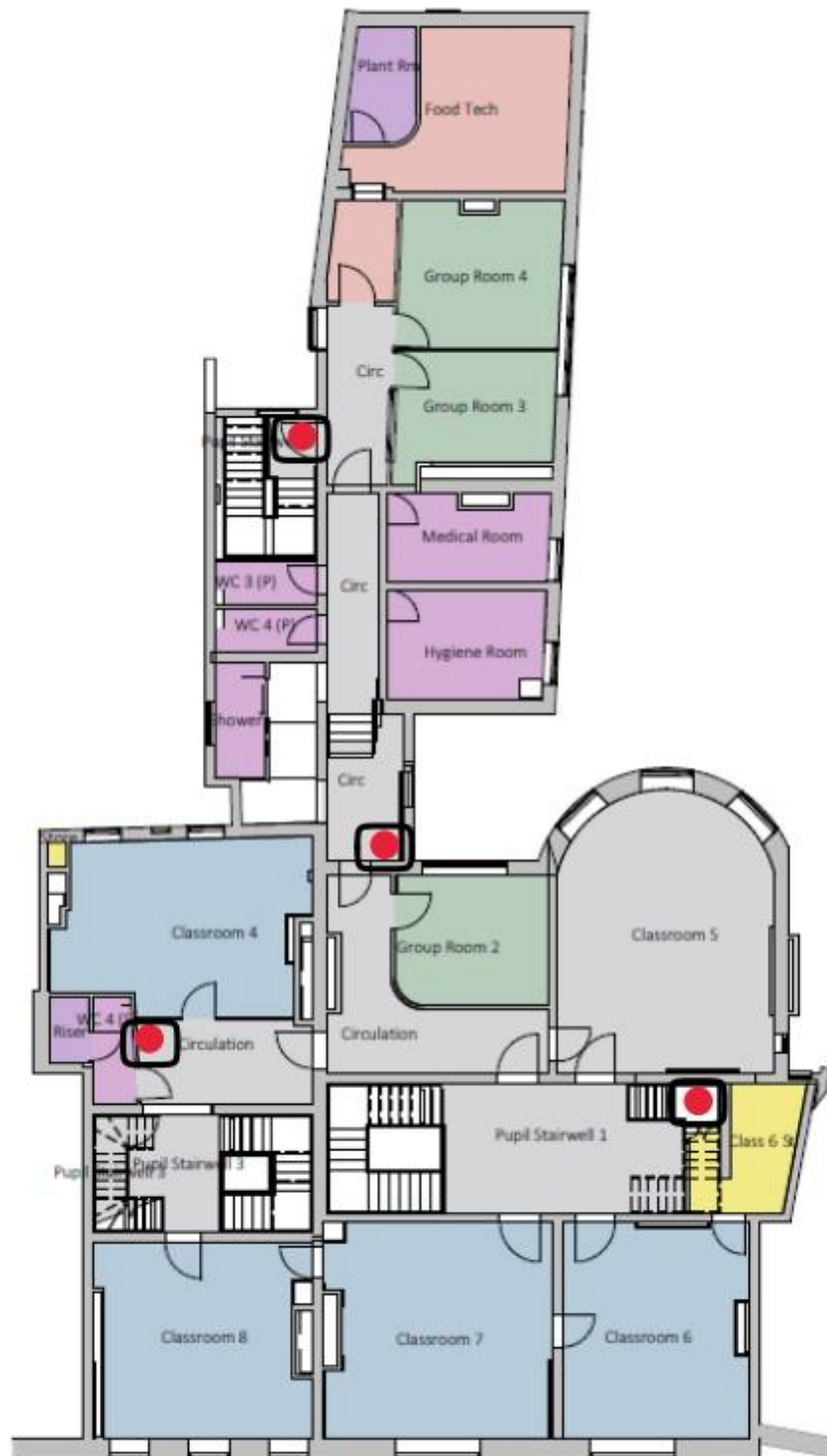
This policy will be monitored and reviewed on an annual basis by the DPO and the Principal. The Principal and Senior Leadership Team will be responsible for monitoring any changes to legislation that may affect this policy and make the appropriate changes accordingly. Changes will be communicated to all members of staff.

14. Appendix 1: Site Layout of CCTV cameras (10-11 Abbey Sq)

 = CCTV camera location



GROUND FLOOR

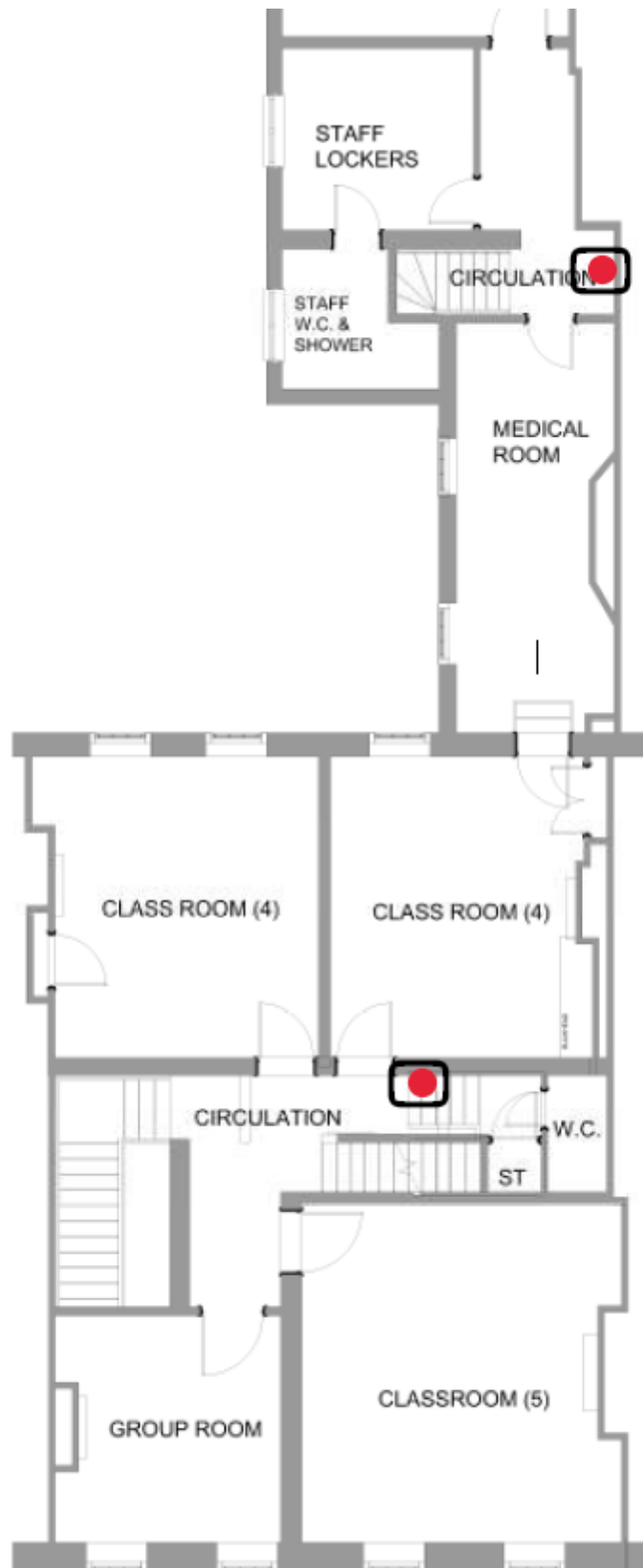


FIRST FLOOR

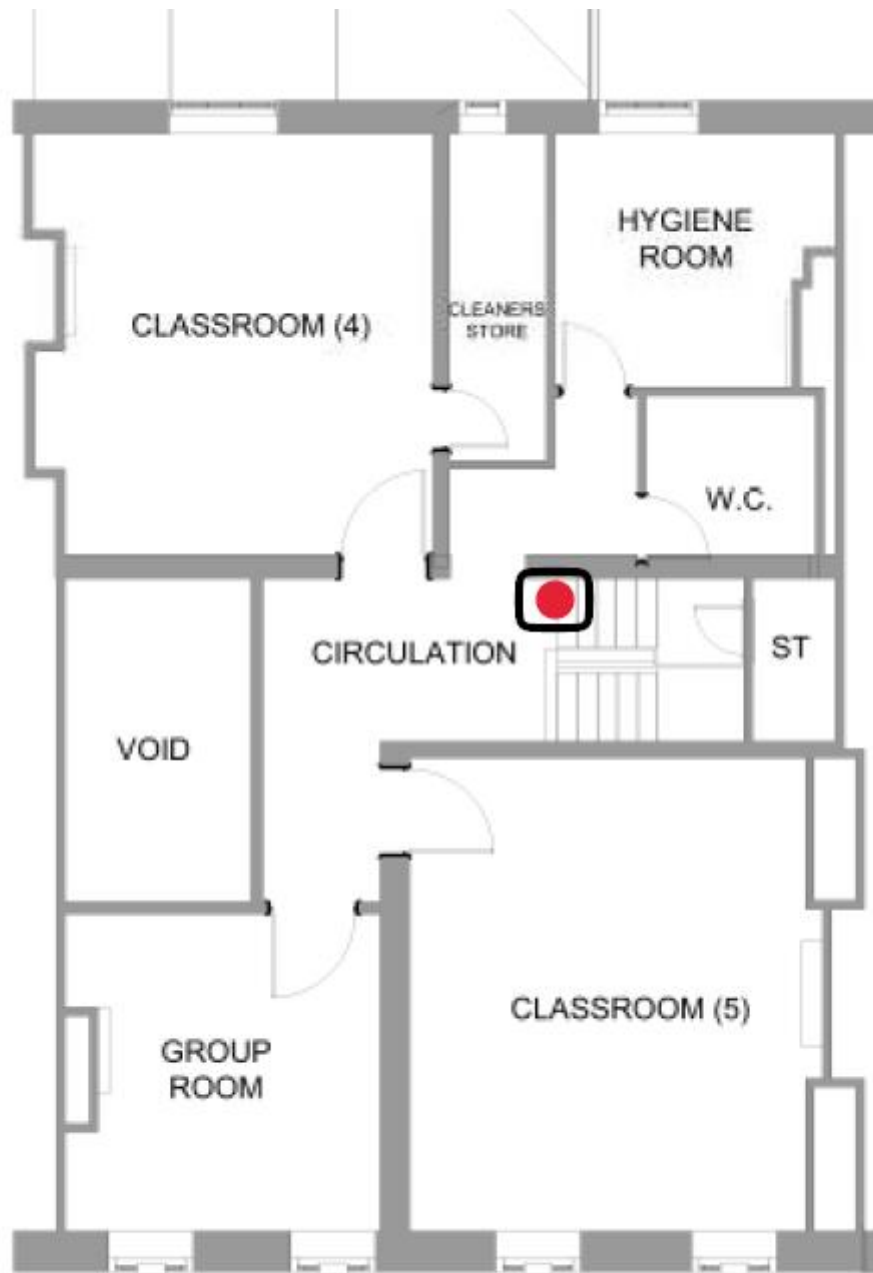


SECOND FLOOR





FIRST FLOOR



SECOND FLOOR

16. Appendix 3: Site Layout of CCTV cameras (3-6 Abbey Green)

ABBEY GREEN: GROUND FLOOR



ABBEY GREEN: FIRST FLOOR

Abbey Green - First Floor Camera Location



