Woodchurch High School

A Church of England Academy

CCTV
POLICY DOCUMENT

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THE CHURCH OF ENGLAND
Diocese of Chester

Table of Contents

CCTV Policy Statement	**3**
Overview	**3**
Responsibilities	**3**
Recorded Images	**4**
Covert Monitoring	**4**
Access and Disclosure of Images	**5**
Subject Access Requests	**5**
Access by Third Parties	**6**
Complaints	**6**
Reviewing and Monitoring of the Policy	**6**
Appendix 1 CCTV Use and Disclosure of Images Protocol	**7**
Appendix 2 Checklist	**8**
Annex A CCTV Signage	**10**

CCTV Policy Statement

Woodchurch High School uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitor the school buildings and grounds in order to provide a safe and secure environment for its pupils, staff and visitors, as well as to prevent loss or damage to school property and surrounds. This policy outlines the school's use of CCTV and how it complies with the General Data Protection Regulation; it is to be read in conjunction to the School's data protection policy.

The CCTV Scheme is registered (Registration Number: Z731227) with the Information Commissioner's Office (ICO) under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 1998. The school complies with the ICO's Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:

https://ico.org.uk/media/1542/cctv-code-of-practice.pdf(Currently being updated by the ICO)

This policy outlines the school's use of CCTV and how it complies with the Act.

Overview

The CCTV System includes static and remotely operated cameras and is used for the purpose of:

- The prevention, detection and investigation of criminal activity and/or activity against the school code of conduct.
- The security of the premises.
- Safeguarding the safety of pupils, staff and visitors.

Cameras are sited so that they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. CCTV is not used in classrooms. The school makes every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas. There is no covert monitoring (i.e. concealed cameras). Sound recording capability is very limited and as such, is not used for monitoring or investigative purposes. The system uses passive technology and is not linked to staff or pupil attendance records. The system is not linked to automated decision making, automated facial recognition or number plate recognition software thus all individuals' images are anonymous until viewed.

The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

Responsibilities

The CCTV system is owned and operated by the school and the deployment of which is determined by the school's leadership team. The person who has been appointed to oversee the system and procedures is the Health & Safety Officer.

The CCTV is monitored securely by authorised individuals via specific desk top computers. These staff Include ICT Support Staff , Health and Safety Officer and SLT - Mr A Smith (Assistant Safeguarding

Officer).Mr P Joplin (Safeguard Lead) , Mrs S loyden - Chief Operating Officer,Pastoral Leaders have access to view the system and Pupil Services staff have access to view the 2 main gate cameras when allowing access to the school. The school server stores the general recorded images for a period up to 30 days.. Specific selected footage ie in relation to an incident is stored on the school Google cloud. The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and members of the school community.

All authorised operators and employees with access to images are aware of these procedures that need to be followed when accessing the recorded images. Through this policy, all operators are made aware of their responsibilities in following the CCTV Code of Practice. The school's 'Data Controller,' (Head Teacher, Ms Rebekah Phillips) will ensure that all employees are aware of the restrictions in relation to access to and disclosure of, recorded images by publication of this policy.

Images recorded

CCTV warning signs are clearly and prominently placed at all external entrances to the school and along the perimeter fence. There are also signs displayed at key sites (e.g. entrances to toilets) within the school buildings.

- The images that are filmed are held in a secure location and can only be accessed by those who are authorised to do so.
- Digital media is used to record images. The recordings will be filed with accurate metadata noting the camera location and time of the recording.
- All retained data will be held securely.
- The system has been set up to provide good quality images.
- Every camera records simultaneously and the images are stored on the server for a period of up to 31 days. After that time, images are erased apart from any which relate to an incident still under investigation, which will be stored in a restricted folder on Google cloud. .
- Routine checks are made to ensure that the system is operating in accordance with the terms of this policy, and that information relating to the recordings (date, time, etc) are accurate. Details and recordings are stored and logged into a Central File CCTV Folder with limited access to the ICT staff , Health and Safety Officer and Chief Operating Officer.
- The planning and design has endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency but it is not possible to guarantee that it will cover or detect every single incident taking place in the areas of coverage.Out of normal working hours some cameras will only record images if movement is detected in order to save on digital storage space.

Covert Monitoring

It is not the school's policy to conduct 'Covert Monitoring' unless there are 'exceptional reasons' for doing so. Any such monitoring would be temporary and be justified as 'exceptional'. The covert surveillance activities of public authorities are governed by the Regulation of Investigatory Powers Act (RIPA) 2000. Such type of recording is covert and directed at an individual or individuals. The school may, in exceptional circumstances, determine a sound reason to covert monitor via CCTV. For example:

- Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- Where notice about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from a member of the senior leadership team (SLT) and the school's 'Data Controller' advised before any commencement of such covert monitoring. Covert monitoring must cease as soon as necessary, such as following completion of an investigation. Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles, changing areas etc.

Access and disclosure of images

Downloading images is strictly controlled and limited to the following staff:

- Safeguarding Leads, Health & Safety Officer and Business Manager - View and download
- ICT Support Team - View and download

All saved data must be handed to the Headteacher or a member of the SLT – staff are trained to understand the administrative regime to control the use of the images.

Access to images by Woodchurch High School staff and pupils is restricted to

● SLT	View Only
● Pastoral staff	View Only
● Pupils and staff for identification purposes	View Only
● Pupil Services Staff (Gate Cameras Only)	View Only
● Premises Manager	View Only
● ICT Staff	View/Download
● Health and Safety Officer	View/Download

Subject Access Requests

Woodchurch High School recognises the rights of staff, students and visitors to the school to make a subject access request for details of personal data held;

- Individuals have the right to request access to CCTV footage that constitutes their personal data, unless an exemption applies the General Data Protection Regulations.

- All requests should be made in writing to the Headteacher. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

- The school will respond to requests within one month of receiving the written request and any fee where disproportionate effort is required to adhere to the request.

- Disclosure of information from surveillance systems must be controlled and consistent with the purpose(s) for which the system was established. When disclosing surveillance images of individuals, particularly when responding to subject access requests, the school will consider whether the identifying features of any of the other individuals in the image need to be obscured. In most cases the privacy intrusion to third party individuals will be minimal and obscuring images will not be required. However, consideration will be given to the nature and context of the footage. The subject will be supplied with a copy of the information in a permanent form. There are limited circumstances where this obligation does not apply. The first is where the data subject agrees to receive their information in another way, such as by

viewing the footage. The second is where the supply of a copy in a permanent form is not possible or would involve disproportionate effort, whereby the disproportionate effort may incur an administration fee.
- Further guidance on SARs is within the Data Protection Policy.

Access by third parties

- There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).
- Requests should be made in writing to the Headteacher
- The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.
- Data transfer will be made securely and using encryption as appropriate.
- The request must be in written form, specifying the date and time (as far as possible) of the image.
- If the decision is taken not to release the images, then the image in question will be held and not destroyed until all legal avenues have been exhausted.

Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.

Use of CCTV

When conducting an investigation, Pastoral Leaders will use CCTV as evidence to ascertain a true version of events. This ensures that justice is serves and perpetrators sanctioned appropriately.

Reviewing and Monitoring of the Policy

This policy is subject to review and approval by the Woodchurch High School Governing Body every three years.

For further Information contact www.ico.org.uk

Appendix 1

CCTV – USE AND DISCLOSURE OF IMAGES
PROTOCOL

Legitimate public concerns exist over the use of CCTV and many of the specific guidelines are designed to satisfy the community that the use of cameras is subject to adequate supervision and scrutiny. It is of fundamental importance that public confidence is maintained by fully respecting individual privacy. All employees that are authorised to view the CCTV imaged within Woodchurch High School must read this protocol alongside the CCTV Policy and confirm that they understand and agree to abide by the policy and protocol.

CCTV images may only be viewed by authorised employees or pupils accompanied by an authorised employee.

All authorised employees viewing the CCTV images will act with utmost probity at all times.

All images viewed by **authorised employees** must be treated as confidential unless police involvement is required due to potential criminal proceedings.

All authorised employees are to ensure that whilst viewing CCTV images, **unauthorised employees** or visitors cannot view the images.

All authorised employees are responsible to ensure that CCTV images are not left on any screen without an authorised employee being left in charge. An authorised employee should log out of the programme when leaving the screen.

Every viewing of the images will accord with the purposes and key objectives of the CCTV system and shall comply with the CCTV Policy.

All authorised employees viewing CCTV images should be aware of exercising prejudices, which may lead to complaints of the system being used for purposes other than those for which it is intended. The viewers may be required to justify their interest in any particular individual, group of individuals or property at any time.

All authorised employees viewing CCTV images are responsible for their viewing of the images, which must be justifiable.

Any breach of the CCTV Policy or CCTV Protocol will be dealt with in accordance with existing discipline regulations. Individuals must recognise that any such breach may amount to gross misconduct, which could lead to dismissal.

Any breach of the Data Protection Act 1998 will be dealt with in accordance with that legislation. All authorised employees viewing CCTV images must be aware of their liability under this Act.

I understand and agree to abide by the CCTV Policy and the CCTV Protocol:

NAME	JOB TITLE	SIGNATURE	DATE

Appendix 2 – Checklist

This CCTV system and the images produced by it are controlled by the Business Manager who is responsible for how the system is used under direction from the schools 'Data Controller'. The school notifies the Information Commissioner about the CCTV system, including any modifications of use and/or its purpose.

The School has 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 the school's community. It will not be used for other purposes. The school will conduct regular reviews of our use of CCTV.

	Checked **(Date if appropriate)**	**By**	**Date of next review**
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Yes.		
There is a named individual who is responsible for the operation of the system.	Yes.		
A system had 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.	Yes.		
Staff and members of the school community will be consulted about any proposal to install / amend CCTV equipment or its use as appropriate.	Yes.		
Cameras have been sited so that they provide clear images.	Yes.		
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Yes.		

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 sign(s).	Yes.		
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes.		
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.	Yes.		
Unless individually approved, images will not be provided to third parties.	Yes.		
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the data controller knows to seek advice from Satswana Ltd and their Data Protection Officer.	Yes.		
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes. (Daily checks)		

https://ico.org.uk/

Annexes

A. CCTV Signage

Annex A – CCTV Signage

It is a requirement of the General Data Protection Regulation to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The school is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the school
- The contact telephone number or address for any enquiries

Example sign.