



# CCTV policy

**ICO registration number: Z1782825**

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| <b>Last updated by senior leaders</b>  | September 2025 |
| <b>Last reviewed by DPO</b>            | September 2025 |
| <b>Last reviewed by advisory board</b> | September 2025 |
| <b>Next review due</b>                 | September 2026 |

## Introduction and intent

- St. John's Preparatory & Senior 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 pupils and staff. This includes monitoring the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.
- The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images is covered by the Data Protection Act 1998. This policy outlines the school's use of CCTV and how it complies with the Act.
- The system comprises a number of fixed and dome cameras.
- The system does not have sound recording capability.
- The CCTV system is owned and operated by the school, the deployment of which is determined by the Principal and the Headteacher at the Senior School.
- The CCTV is monitored by the Principal and the Headteacher for security purposes. It is also accessed via a password-protected app which only the Principal and the Headteacher have on their work mobile devices. This app does not have a recording capability. At both schools, the CCTV covering gated entrances and exits are monitored in the main school offices.
- All authorised operators with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained to understand their responsibilities under the CCTV Code of Practice.
- When recorded footage is accessed, a signed and dated log is made in the relevant logbook.
- CCTV warning signs are clearly and prominently placed at the two external entrances to both School sites and along the drive up to the School.
- The School complies with the Information Commissioner's Office (ICO) CCTV 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 here.](#)

## Camera locations

- The planning and design endeavours to ensure that the CCTV system gives maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.
- Cameras are sited so they only capture images relevant to the purposes for which they are installed (described above) and care is taken to ensure that reasonable privacy expectations are not violated. The School ensures that the location of equipment is carefully considered so that images captured comply with the Data Protection Act.

- The school makes every effort to position cameras so that their coverage is restricted to the premises, which may include outdoor areas. CCTV may be used in some classrooms to prevent theft and damage to school property. Devices are clearly visible as they are positioned either on the ceiling or on the walls. They are never used in private areas, such as toilet facilities.

### **Storage and retention of CCTV images**

- Recordings last for seven weeks and then overwrite themselves.

### **Access to and disclosure of images to third parties**

- Access to recorded images is restricted to the individuals authorised to view them.
- 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).
- The data may be used to support the school's discipline procedures as required and will be subject to the usual confidentiality requirements of those procedures.
- The final decision to share CCTV images will always be made by the Principal.

### **Subject Access Requests (SAR)**

- As per the school's data protection policy, individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- All SAR requests should be made in writing to the Principal as per guidance in the data protection policy. Individuals submitting requests should provide sufficient information to enable the footage relating to them to be identified, including the date, time and location.
- The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

### **Covert monitoring**

- The school may in exceptional and time-limited circumstances, authorised by the Principal, set up covert monitoring. For example:
  - a) where there is good cause to suspect that illegal or unauthorised action is taking place, or where there are grounds to suspect serious misconduct.
  - b) where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, such as toilet facilities.
- Covert monitoring will always cease following completion of an investigation.

## Annual review checklist

|   | Date checked | By            | Date of next review |
|---|--------------|---------------|---------------------|
| Notification has been submitted to the Information Commissioner and the next renewal date recorded.   | 01/09/2025   | DB, GDPR Lead | September 2026      |
| There is a named individual who is responsible for the operation of the system.   | 01/09/2025   | DB, GDPR Lead | September 2026      |
| 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.                    | 01/09/2025   | DB, GDPR Lead | September 2026      |
| Staff and members of the school community were consulted about the proposal to install CCTV equipment.  | 01/09/2025   | DB, GDPR Lead | September 2026      |
| Cameras have been sited so that they provide clear images.  | 01/09/2025   | DB, GDPR Lead | September 2026      |
| Cameras have been positioned to avoid capturing the images of persons not visiting the premises.  | 01/09/2025   | DB, GDPR Lead | September 2026      |
| There are visible signs showing that CCTV is in operation.  | 01/09/2025   | DB, GDPR Lead | September 2026      |
| Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.  | 01/09/2025   | DB, GDPR Lead | September 2026      |
| 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.   | 01/09/2025   | DB, GDPR Lead | September 2026      |
| Except for law enforcement bodies, images will not be provided to third parties.  | 01/09/2025   | DB, GDPR Lead | September 2026      |
| The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made. | 01/09/2025   | DB, GDPR Lead | September 2026      |
| Regular checks are carried out to ensure that the system is working properly and produces high quality images.  | 01/09/2025   | DB, GDPR Lead | September 2026      |