



Every Minute Matters

CCTV Procedure

Palm Bay Primary School

Reviewed – September 2026

Date of Next Review – September 2027



CCTV PROCEDURE

INTRODUCTION

EKC Schools Trust uses closed circuit television (CCTV) systems at all its Academies to provide a safe and secure environment for pupils, staff and visitors and to protect the Trust's property. Specifically, CCTV is used to:

- Assist in prevention and detection of crime;
- Assist with the identification, apprehension and prosecution of offenders;
- Assist with the identification of unlawful actions;
- Monitor security of school buildings and property;
- Inform accident and incident investigations;
- Monitor and manage the security in car parking areas and other external areas where installed.

This document sets out the accepted use and management of the CCTV system to ensure the Trust complies with data protection legislation, the Human Rights Act 1998 and other relevant legislation. The Trust works in accordance with the Information Commissioner's CCTV Code of Practice and will adhere the principles in the Code as far as is reasonably practicable.

PROCEDURES 1. Principles and standards for using the CCTV system

The use of the system will:

- always be for the purpose specified which is in pursuit of a legitimate aim and necessary to meet an identified pressing need;
- take into account its effect on individuals and their privacy;
- have as much transparency as possible, including a published contact point for access to information and complaints;
- have clear responsibility and accountability for all surveillance activities including images and information collected, held and used;
- have clear rules, policies and procedures in place and these must be communicated to all who need to comply with them;
- have no more images and information stored than that which is needed for the legitimate purpose;
- restrict access to retained images and information with clear rules on who can gain access. No member of staff will be permitted to view CCTV footage on their own. A member of the Senior Leadership Team should be present, and the relevant details completed on the access log by the CCTV unit;



- consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards;
- be subject to appropriate security measures to safeguard against unauthorised access and use;
- have effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with;
- be used in the most effective way to support safety and law enforcement with the aim of processing images and information of evidential value, when used in pursuit of a legitimate aim; and,
- be accurate and kept up to date when any information is used to support a surveillance camera system which compares against a reference database for matching purposes.

Overview of the system

- The CCTV system runs 24 hours a day, 7 days a week.
- The CCTV system comprises fixed position cameras; pan tilt zoom cameras, monitors; multiplexers; digital recorders and public information signs.
- CCTV equipment will not record sound.
- Cameras will be positioned primarily in external areas, and every effort will be made to position cameras so that they only cover School premises. Cameras will not be positioned in private areas such as toilets and changing rooms. Where a need is identified for CCTV in an internal area, a full data protection impact assessment will be carried out to ensure that there is a legitimate reason for surveillance in that area and that privacy and data protection obligations are met.
- All CCTV images produced will be as clear as possible in order to remain effective for the purposes of the scheme.
- CCTV signs will be prominently placed at strategic points and at entrance and exit points of the Trust's properties to inform staff, pupils, visitors and members of the public that CCTV is in use. The notices will provide contact details for the Data Controller.
- Although every effort has been made to ensure maximum effectiveness of the CCTV system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.
- An inventory of all locations and areas where CCTV systems are in place will be completed and updated and retained by the relevant School Business Manager (or equivalent) as additional schemes are introduced.



- Before installing and using additional CCTV coverage on Trust premises, a Data Protection Impact Assessment will be carried out (refer to the Trust's Data Protection policy for further details).

Operation and oversight of the CCTV system

The following staff are responsible for the effective and compliant use of the CCTV system at each of the Trust's sites and for ensuring that staff are trained and competent in the use of the systems. For the purposes of this procedure, they are referred to as the responsible person(s).

Briary Primary School	School Business Manager
Bysingwood Primary School	School Business Manager
Holywell Primary School	School Business Manager
Queenborough Primary School	Operations Manager
East Stour Primary School	School Business Manager
Palm Bay Primary School	School Business Manager

- The Head Teacher of each School is responsible for providing adequate resources to ensure that CCTV systems are fit for purpose. The Data Protection Officer is responsible for providing advice and guidance on compliance matters.
- CCTV users will be required to sign a CCTV user declaration.
- All installed CCTV systems will be networked, where possible, by the school's IT provider to ensure remote access to the system operators. Other designated members of staff may be given restricted remote access to the CCTV systems but only upon prior approval by the responsible person(s). This shall include IT staff who will be required to setup cameras and systems on the school's IT network.
- CCTV monitors will be located in secure areas and will be positioned in such a way as to protect the privacy of individuals e.g. not viewable through windows.
- A record will be kept of all CCTV images that are viewed and downloaded. The record will be retained by the relevant School Business Manager for 3 years.
- Schools will not undertake any covert operations using hidden CCTV systems. However, the Police may use their own covert surveillance equipment if there are legitimate reasons for doing so e.g. for the detection and prosecution of unlawful activities.



- Checks will be undertaken on a regular basis, but at least monthly, by the system operators to ensure that all cameras are functioning correctly. Any malfunctions will be reported to the responsible person(s) as soon as possible.
- Servicing and maintenance will be carried out by a reputable and qualified contractor at least on an annual basis. CCTV systems will have the time/date and camera identification code on the screen. All times and dates should be locked onto the GPS time signal.
- All regular checks will be made by the system managers against the 'speaking clock' or another known accurate source to ensure accuracy. This is particularly important at GMT/BST changes.

Access to CCTV images and recordings – internal use

- Staff may view CCTV images in the presence of the responsible person(s) or their appointed deputy for the purposes of identifying and verifying the identity of persons who may be implicated in unlawful activities or the contravention of the Trust's policies and procedures.
- IT Network staff may have access for the purposes of set up and maintenance of the system.
- Where CCTV images are downloaded for the purposes of a staff or pupil disciplinary matter, a record will be kept.

Access to and disclosure of images to subjects and third parties

- Individuals may request access to CCTV images of them by submitting a Subject Access Request (refer to the Subject Access Request procedure for further details). Please note that parents do not have an automatic right to CCTV images of their children.
- Consideration needs to be given as to whether the images contain the personal data of other parties. If this is the case, the School must not release images to the parents.
- Access to CCTV images by third parties e.g. the Police will only be granted in circumstances related to the prevention and detection of crime, national security, safeguarding matters or legal proceedings.
- All such access requested by third parties is not an automatic right. The School must consider whether access is legitimate.
- Where disclosure and release of images is made, consent does not need to be obtained from the data subjects concerned if the incident relates to matters detailed in the first bullet point.
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- In no circumstances will CCTV images be released for media or external training purposes.

Data retention and security

Images will be held for a maximum of 40 days and automatically deleted thereafter. Exceptions to this are if images copied onto another device (disk or USB stick) for:

- Use as evidence by the School for disciplinary proceedings.
- Use as evidence by the Police or Courts.
- Any recorded disks or media kept for evidential purposes will be destroyed either after 3 months or as soon as it is established that the evidence is no longer required. If disks or media are requested by the Police and not collected within a reasonable period of time, the Officer in the Case should be contacted by the member of authorised staff who has possession of the disk or media to establish whether the disk / media is still required.
- Any recordings made on removable media shall be secured in a lockable cabinet or other suitable means with access only by authorised personnel.
- Electronic files will be retained by the relevant School Business Manager on a defined and secure drive and password protected. A standard file naming convention will be as follows YYMMDD_incident name or initials of individual e.g. 170306_bike theft_LM