



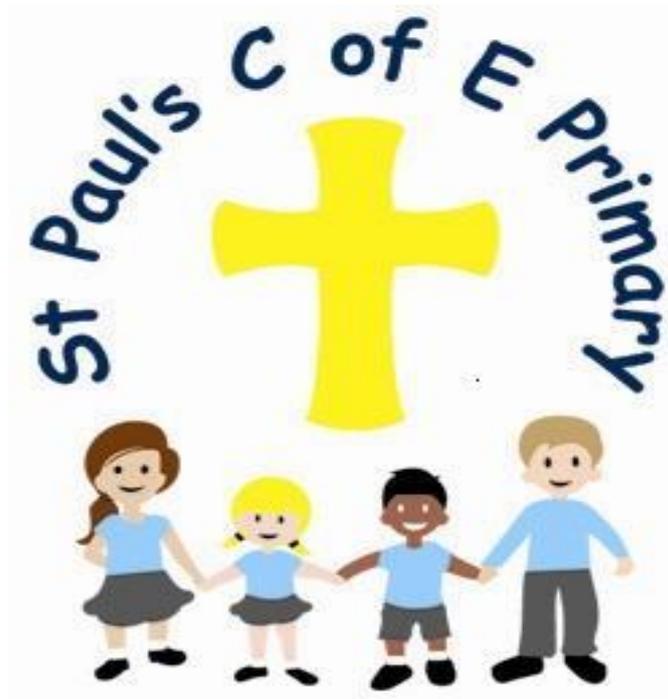
Information Governance

Support Services

by Stockport Council

St. Paul's C of E Primary School

CCTV Policy



Approved by the Resources Committee: Autumn 2025

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| Version | Author | Policy approved by | Approval date | Review date | Changes made? |
|---------|---------|--------------------|---------------|-------------|------------------|
| V1 | IG Team | IG Team | 28.10.2022 | 01/09/2024 | New Policy |
| V2 | IG Team | IG Team | 16/09/2024 | 01/09/2026 | Minor amendments |



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1. Introduction

St. Paul's C of E Primary School uses closed circuit television (CCTV) images to help reduce crime and monitor the school buildings in order to provide a safe and secure environment for students, staff and visitors, and to prevent the loss of, or damage to, school property.

The system comprises of 2 fixed cameras to monitor the front car park gate.

We do not record audio through the CCTV system.

The system is administered and managed by the school, who act as the Data Controller, as defined by the UK General Data Protection Regulation (GDPR).

New CCTV systems will be introduced in consultation with staff and governors. Where systems are already in operation, their use will be reviewed regularly.

2. Objectives of CCTV

The school uses CCTV for the following:

- Ensuring a safe environment for pupils, staff and visitors.
- Deterring criminal acts against persons and property.
- Assisting the police in identifying persons who have committed an offence.
- Allowing for the prevention, investigation and detection of crime.
- Monitoring the security of the site.
- Allowing for the apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings).
- Ensuring damage to the gate can be traced to the vehicle responsible.

CCTV systems will not be used to monitor normal teacher/student classroom activity in school.

3. Identification of CCTV cameras

Locations have been selected, both inside and out, that the school reasonably believes require monitoring to address the stated objectives.

In areas where CCTV is used the school will ensure that there are prominent signs in place to inform individuals they are entering a monitored area. These signs will contain:



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- Details of the Data Controller operating the CCTV
- Contact details for further information regarding the system

4. Supervision of the system

Images from the CCTV system are only accessible to named individuals who are authorised to monitor CCTV for the stated objectives. This includes the following positions:

- Headteacher
- School Business Manager
- School Office Manager
- Site Supervisor

Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

5. Storing digital images

Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific times and dates to be identified. Access to live images is restricted to the CCTV operator, unless the monitor displays a scene which is in plain sight from the monitored location.

Recorded images can only be viewed in a restricted area by approved staff. The recorded images are viewed only when there is suspected criminal activity and not for routine monitoring of pupils, staff or visitors.

The school reserves the right to use images captured on CCTV where there is activity that the school cannot be expected to ignore such as criminal activity, potential gross misconduct, or behaviour which puts others at risk. If a CCTV camera has recorded a specific incident under investigation, recordings may be used in both student and staff investigatory and potentially disciplinary proceedings to provide evidence as appropriate.

Images retained for evidential purposes will be retained in a locked area accessible by the system administrator only. Where images are retained, the system administrator will



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ensure the reason for its retention is recorded, where it is kept, any use made of the images and finally when it is destroyed.

6. Retention and erasure

Images captured by CCTV/Surveillance will not be kept for longer than is necessary. Images are stored on a 4GB hard drive which holds approximately 1 month of images. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated.

There is no specific minimum or maximum periods which apply to CCTV recorded images. The school ensures that images are not retained for longer than is necessary. Once the retention period has expired, the images are removed or erased.

7. Access to CCTV images

Requests for disclosure

Data will not normally be released unless satisfactory evidence that it is required for legal proceedings or under a court order has been produced. In other appropriate circumstances, the school may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.

Subject access requests

The UK GDPR and Data Protection Act gives individuals the right to request a disclosure of their personal data, which can include CCTV images (see Data Subjects' Rights Policy). A request can be made verbally or in writing and identification may be requested by the school. The school aims to respond to all requests within one month.

In order to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording and the location where the footage was captured. Images of third parties will not be disclosed as part of a SAR, where doing so will contravene data protection legislation.

The school will maintain a record of all disclosures of CCTV footage.

All requests should be directed to the attention of admin@st-pauls.stockport.sch.uk.



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8. Installation of new CCTV systems

CCTV has the potential to be privacy intrusive. The school will perform a Data Protection Impact Assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and addresses one of the stated objectives.

9. Complaints and queries

Any complaints or queries in relation to the school's CCTV system, or its use of CCTV, should be referred to the Headteacher at admin@st-pauls.stockport.sch.uk.