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CCTV policy

Version Control:

Version number	Date	Amendments made	By who?	Approval date
1	September 2025		G.Gibbons	September 2025

‘Together in truth and faith we learn and grow as God’s family’

Mission Statement

Together in truth and faith we learn and grow as God's family

At St Francis, we show the joy of being the children of God:

TRUTH

Truth and love are at the heart of our school

FAITH

By following in Jesus' footsteps, our faith is strengthened

LEARN

We promote and nurture the uniqueness of every child while striving for excellence in God's presence

GROW

As part of the family of St Francis we grow closer to God through our daily words and actions

A WHOLE SCHOOL POLICY FOR CCTV

1. Introduction

1.1. The school utilise closed circuit television (CCTV) to secure our site and provide a safe working environment for those in our care. The aim of this policy is to regulate the management, operation and use of the CCTV system.

1.2. This policy is compliant with the following legislation:

- UK General Data Protection Regulation (UK-GDPR)
- Data Protection Act (DPA, 2018)
- Data Use and Access Act (DUAA, 2025)

Due regard is given to the Information Commissioners Office's (ICO) guidance and code of practice into the use of CCTV and video surveillance: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/

1.3. The CCTV system comprises of a number of fixed and domed cameras located internally and externally around our site.

1.4. The school own and operate our CCTV system. For the purposes of the UK-GDPR, we are the data controller for the system; this means that we are responsible for the system and footage recorded and make decisions about how it is used. Please refer to our 'Data Protection Policy' for further information.

2. Objectives of the CCTV System

2.1. A. To increase personal safety of students, staff and visitors and reduce the fear of crime
B. To protect our building and assets
C. To support the police and other authorities to deter and detect crime
D. To evidence and assist in the apprehension and prosecution of offenders
E. To investigate any instances of inappropriate behaviour by students, staff and visitors
F. To safeguard and support the health and wellbeing of those in our care and immediate community
G: To ensure school policy is adhered to and adequately respected

3. Statement of Intent

3.1. The school is registered with the ICO as a user of CCTV; an annual subscription fee is paid.

3.2. The school will manage the system, footage and associated documentation in compliance with the aforementioned data protection legislation.

3.3. The school will only utilise the CCTV system to fulfil the objectives outlined in section 2 of this policy. The system and / or footage will not be used for any commercial purposes; nor must footage be disclosed publicly (to the media for instance) or to unauthorised person(s).

3.4. The headteacher will manage any requests from the police and other parties in line with our Data Protection Policy. Any staff in receipt of a request whether verbal or written must notify the headteacher without undue delay.

3.5. The school will not disclose any CCTV footage unless assurances have been provided to verify the requesters identity and authority to make the request.

3.6. The school will not focus its CCTV cameras on specific students, staff, visitors, members of the public, private vehicles or property unless an immediate response to an incident it required. We will not routinely monitor individuals or partake in covert surveillance.

3.7. Staff with operational access to the system will not alter or make any changes to the settings without explicit approval from the headteacher, for example altering sound capabilities or deleting footage.

3.8. For transparency, The school will inform individuals of the presence of the CCTV system and recording through clear UK-GDPR compliant signage and privacy information.

3.9. A data protection impact assessment (DPIA) will be undertaken prior to any installation or update of the CCTV system.

4. Scope and Operation

4.1. The governing body will hold ultimate responsibility for decision making regarding our CCTV system; the headteacher will manage the day-to-day operations of the system.

4.2. Access to the system and footage is limited to the headteacher and deputy headteacher only.

4.3. The system is operational on a rolling 24/7 basis for 365days of the year and covers the main site entrances, car park, immediate vicinity and internal areas.

4.4. The systems processes images only; sound capabilities have been limited.

5. Data Storage and Security

5.1. A live screen is available to staff with access during working hours; footage cannot be viewed or extracted without inputting login details into the system. The live screen is secured in a locked cupboard that is only accessible by the aforementioned staff members.

5.2. Third-parties entering the locked cupboard with the live screen will be subject to strict arrangements and accompanied by a senior staff member. This includes visitors applying maintenance and fixes to the system.

5.3. The CCTV server is encrypted; users with access to recordings will be issued with their own login and password. The server is located out of sit within a locked room in a locked cupboard with access limited.

5.4. Out of hours, only the headteacher and deputy headteacher have access to the system if onsite in school.

5.5. The headteacher and deputy headteacher will perform routine checks to ensure the CCTV system is operational and recording; this will include reviewing the date and time for accuracy and a check on recordings for quality. The headteacher and deputy headteacher will also ensure hard disk space is adequate.

5.6. Footage will be retained for a period of one calendar month only, after which it will be automatically overwritten. Any footage required beyond this period, for evidence purposes for instance will be extracted and kept in a secure encrypted external drive and stored in a locked cabinet.

5.7. Logs and records will be held to evidence:

A. Access to the system
B. Functionality and maintenance checks
C. Extraction and disclosure of any footage

6. Disclosure of Footage: General

6.1. The export of any data from the CCTV system must be approved by the headteacher; the chair of governors should be consulted in their absence. Advice will be sought from the Data Protection Officer (DPO) where necessary.

6.2. The requester must provide as much detail as possible regarding the details, date and approximate time of any incident; the school will perform an appropriate and reasonable search only in respect of the resources available.

6.3. If disclosure has been deemed lawful and necessary and the footage is available on the system, the school will invite the requester to review the footage on site accompanied by a senior staff member to eliminate the need to produce copies. Clips will be limited to the specified incident; requesters must not be permitted to control and review footage.

6.4. In the event that a copy of footage is required, this must be limited to the specific incident using one of the following methods:

A. Printed stills with third-party identities redacted where appropriate and necessary
B. Extraction to removeable disk or external storage device, USB etc; a password should be applied to the file. Hardware will be checked to ensure it is clear of any further files or previous footage prior to release. The file must be stored in a locked cabinet or area in preparation for collection.
C. Extraction to a secure area of the drive with access limited to authorised staff; a password should be added to the file. Transfer to a third-party must only be conducted through an encrypted portal or secure email.

6.5. A record of all requests will be kept which includes key details which includes:

A. Dates request was received and sent
B. Requester details and verification checks
C. Details of the footage and if it will be provided or not (detail any exemptions)
D. Method of transfer
E. Proof of receipt

F. Key correspondence

7. Disclosure of Footage: Police, Insurance and Competent Authorities

7.1. The school will follow the steps outlined in section 6 of this policy in respect of requests from the police, insurance providers (legal claims) and other competent authorities. Requests must be referred to the headteacher without undue delay. The DPO will advise and support the school through the request process.

7.2. The school will require a formal request form (usually referred to as a DPA) from the police to access any footage; the form must be approved and signed by a ranked inspector or above to verify the request.

7.3. Equal levels of verification will be required from further authorities including the courts, local authorities and insurance providers in relation to legal claims.

7.4. The school will extract the relevant footage from the CCTV system to avoid data loss if the request is likely to extend beyond the retention period of one month. Extracted data must be kept securely with access strictly limited.

7.5. Footage must not be released to individuals party to an incident being investigated by the police or other competent authorities; disclosure may jeopardise any such investigation / prosecution and place the victims and other individuals at risk. The police or other competent authority must be consulted for advice and provide explicit (written) authorisation.

7.6. Individuals requesting copy footage to share with the police or insurance should be directed to the relevant authority to make the request officially.

8. Disclosure of Footage: Subject Access Requests

8.1. The school will follow the steps outlined in section 6 of this policy in respect of 'subject access requests' made under the UK-GDPR. Requests must be referred to the headteacher without undue delay. The DPO will advise and support the school through the request process.

8.2. Individuals wishing to make a request to access CCTV footage that contains their own personal data (or that of their child) can do so by making a 'subject access request' under the UK-GDPR. The school will process any requests in accordance with our Data Protection Policy. Requests should ideally be made in writing and addressed to the DPO.

8.3. In the event that the requester is unknown to the school or is making the request on behalf of an individual in the footage (solicitor, family member etc), we will take steps to verify their identity and seek assurances that the request is legitimate. Letters of authority, proof of parental responsibility and other methods of verification may be sought.

8.4. Please note that individuals can only request access to their own personal data under the UK-GDPR and not that of third parties unless the third party has provided consent or authorisation to do so. Requests relating to the personal data of younger children (age 12 and under) will typically be accepted from the parent or legal guardian.

8.5. The school will not provide footage as part of a 'subject access request' if disclosure would:

A. Jeopordise or prejudice an ongoing investigation or prosecution by the police or other competent authorities, courts etc.
B. Risk the health and wellbeing of any individual or third-party
C. Reveal the identity of third-parties to the extent that disclosure impacts their right to privacy

8.6. More often than not, CCTV footage will include third-parties. The school will not provide such footage as part of a 'subject access request' unless:

A. The third-parties have provided written consent for us to do so
B. It is reasonable and appropriate to do so; disclosure would not impact their privacy, for example, an individual is not directly involved in an incident but may be present at distance in the background
C. It is possible to redact / omit third parties from the footage

8.7. Our CCTV system does not have advanced capabilities to blur or redact third-parties present within video footage. Where possible and appropriate, the school may provide redacted stills and / or a written account as an alternative.

8.8. In accordance with our Data Protection Policy, a response will be provided within one calendar month. The school reserves the right to extend more complex requests by a further two calendar months; we will notify the requester of any intention to extend within the first month. In such situations, the footage in question will be extracted and kept securely to avoid automated deletion.

8.9. If the school refuses a request, details will be provided in any response along with the relevant exemption from the Data Protection Act (where appropriate).

9. Monitoring Inappropriate Behaviours

9.1. The school do not routinely monitor the actions and behaviours of our staff, students and other visitors to site. Nor do we use the system to monitor work levels and performance. We may however use the system to review and evidence any instances of inappropriate behaviours that do not align with our policies, culture and practices. We do this to protect the health and wellbeing of those in our care and keep our site and assets safe.

9.2. Upon notification of an incident, the school may use the system to investigate what happened and identify the parties involved. Footage may be used as evidence (where appropriate) if disciplinary action or a legal claim is enacted as a result.

9.3. Please note that cameras do not record sound; only images are recorded to protect the privacy of those on site.

9.4. The school do not partake in covert monitoring (observation, tracking or recording carried out in a way designed to ensure the subject is unaware of the monitoring). In the event that an instance arises in which the police or another authority require us to do so, we will ensure that any processing is compliant with data protection law.

10. Maintenance

10.1. The school appoints a third-party organisation to perform improvements and maintenance to our CCTV system. Such service providers will only access footage if it is required to test and perform fixes to the system.

10.2. The school have strict agreements and conditions in place with any third-party maintenance companies that may be required to access footage to perform their role. Checks are performed to ensure third parties are compliant with data protection law.

10.3. The school do not currently employ any third-party company or individual to monitor our system in or out of working hours. The system is managed internally and monitored by school staff only.

11. Transparency and Signage

11.1. Alongside this policy, individuals can find further information on how and why the school use and process their personal data by accessing our latest privacy notices. These can be found on our website or requested from the office.

11.2. Clear signage will be installed at strategic locations around the site to inform individuals of the CCTV systems presence. This will include key entrances and areas around the external vicinity of the site. Signage will be in place internally to serve as a reminder that the system is operational and recording.

11.3. Key entrance signage must include the fact that CCTV is in place and recording, the purpose (site security, prevention & detection of crime etc), the name of the school as the Data Controller and contact details for any questions or concerns.

11.4. The school provide avenues for any staff, students, visitors or members of the public to ask questions or raise concerns about our CCTV system. Please contact us for further information.

12. Complaints

12.1. The school ask that any concerns regarding our use of CCTV are raised with us in the first instance to allow us the opportunity to review and respond accordingly. Individuals also have the right to complain to the Information Commissioners Office if concerns remain unresolved following our response.

13. Monitoring

13.1. This policy will be reviewed on an annual basis or sooner alongside the school's CCTV privacy impact assessment. Updates may be made sooner in the event of a significant change in processing or change in legislation.