



# CCTV Policy

## 2025-26

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## Document Control

|                             |                                                                                                                  |
|-----------------------------|------------------------------------------------------------------------------------------------------------------|
| <b>Review Frequency</b>     | Annual                                                                                                           |
| <b>Review Date</b>          | September 2025                                                                                                   |
| <b>Ratified By</b>          | CAST SELT                                                                                                        |
| <b>Date of Ratification</b> | 22.09.25                                                                                                         |
| <b>Lead/Owner</b>           | Chief Operating Officer                                                                                          |
| <b>Target Audience</b>      | Headteachers, senior staff, and Trust leaders who operate and oversee CCTV systems within Plymouth CAST schools. |
| <b>Document Version</b>     | 1.2                                                                                                              |

The electronic version is the definitive version of this document.

The content of this procedure may be subject to revision from time to time in line with the policy review schedule or when legislation changes or operational reasons arise. Consultation with the recognised trade unions will be completed before any changes are made.

## Version Changes

| Version    | Page Number | Details of Change                             | Agreed By | Date           |
|------------|-------------|-----------------------------------------------|-----------|----------------|
| <b>1.2</b> | 4           | Plymouth CAST Vision & Values added to policy |           | September 2025 |
| <b>1.2</b> | 5           | Hyperlink to ICO Code of Practice updated     |           | September 2025 |

## Vision and Values

Plymouth CAST is a multi-academy trust of Catholic schools which is part of the mission of the Catholic Church dedicated to human flourishing and the building of a kingdom of peace, truth and justice. The Trust is to be conducted in all aspects in accordance with canon law and the teachings of the Roman Catholic Church and at all times to serve as a witness to the Catholic faith in Our Lord Jesus Christ.

Our vision and values are derived from our identity as a Catholic Trust. Central to our vision is the dignity of the human person, especially the most vulnerable. Our academies are dedicated to providing an education and formation where all our pupils and young people flourish in a safe, nurturing, enriching environment. All governors in our academies are expected to be familiar with the vision, mission, values and principles of the Trust and not in any way to undermine them. They should support and promote the vision and conduct themselves at all times in school and on school business according to the vision and principles of the Trust.

Plymouth CAST expects all its employees to recognise their obligations to each school within the Multi-Academy Trust, the public, pupils and other employees and to provide consistently high standards of education and performance at all times and in accordance with Plymouth CAST's vision, mission and principles.

## 1 Introduction

1.1 [insert school name] uses closed circuit television (CCTV) images to monitor the school's buildings in order to provide a safe and secure environment for pupils, staff and visitors, to reduce crime and to prevent loss or damage to school property.

1.2 The system comprises a number of fixed cameras.

1.3 The system capability records both sound and images.

1.4 The CCTV system is owned and operated by the school, the deployment of which is determined by the Headteacher, with support from the Trust Estates & Facilities Manager.

1.5 The CCTV is monitored centrally from the school office by the Headteacher/Senior Administrator/Senior Site staff. (Delete as applicable)

1.6 The introduction of, or changes to CCTV monitoring will be subject to consultation with staff and the school community.

1.7 The school's CCTV Scheme is registered with the Information Commissioner's Office under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings is covered by the UK GDPR and the Data Protection Act 2018. This policy outlines the school's use of CCTV and how it complies with the data protection legislation.

1.8 All authorised operators, and employees with access to images, are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are trained in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

1.9 This policy will be used in conjunction with the document named "[PCAST CCTV Checklist](#)" which is available as a template document on the CAST portal.

## **2 Statement of Intent**

2.1 The Trust complies with 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 at:  
<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/>.

All authorised operators will sign to agree they have understood this policy on an annual basis and/or when changes are made to this policy.

2.2 CCTV warning signs are clearly and prominently placed at all external entrances to the school, including school gates, where coverage includes outdoor areas. Signs contain details of the purpose for using CCTV. In areas where CCTV is used, the school ensures that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

2.3 The planning and design of the camera placement is intended to ensure that the CCTV Scheme will give 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.

2.4 CCTV surveillance at the schools is intended for the purposes of:

- Protecting the school buildings and assets, both during and after school hours;
- Promoting the health and safety of staff, pupils and visitors;
- Preventing bullying;
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- Supporting the police in a bid to deter and detect crime;
- Assisting in identifying, apprehending and prosecuting offenders;
- Ensuring that the school rules are respected, so that the school can be properly managed.

### **3 Siting the Cameras**

3.1 Cameras are sited so 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. The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the UK GDPR and the Data Protection Act 2018.

3.2 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

3.3 CCTV will not generally be used in classrooms, but in areas within the school that have been identified as not being easily monitored. If CCTV is placed in classrooms, it must be with the consent of the Plymouth CAST Senior Executive Leadership Team and parents must be consulted in advance; a DPIA would be completed by the Headteacher and agreed by both the Director of Education and the Chief Operating Officer, in consultation with the DPO.

3.4 Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

### **4 Covert Monitoring**

4.1 The school may in exceptional circumstances set up covert monitoring, 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 notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

4.2 In these circumstances authorisation must be obtained, in advance, by the Headteacher from the Plymouth CAST Senior Executive Leadership Team and the Data Protection Officer.

4.3 A data protection impact assessment will be carried out, by the Headteacher, prior to any covert monitoring and must be signed off by the Data Protection Officer, Chief Operating Officer and Director of School Improvement.

4.4 Covert monitoring must cease following completion of an investigation.

4.5 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.

### **5 Storage and Retention of CCTV Images**

5.1 Data from CCTV cameras will not be retained indefinitely but will be permanently deleted once there is no reason to retain the recorded information. Exactly how long images will be retained for

will vary according to the purpose for which they are being recorded. For example, where images are being recorded for crime prevention purposes, data will be kept long enough only for incidents to come to light. In all other cases, recorded images will be kept for no longer than 30 days. All images stored in whatever format will be erased permanently and securely.

5.2 Only the Headteacher, or a member of the Plymouth CAST Senior Executive Leadership Team (or designate), will be permitted to download, store and/or retain CCTV images and/or sound files.

5.3 All retained data will be stored securely, by the Headteacher, or member of the Senior Executive Leadership Team (or designate), on their Plymouth CAST Google Drive.

## **6 Access to CCTV Images**

6.1 Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available unless responding to a formal SAR, and under the guidance of the DPO, which should be sought in advance.

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

7.1 Individuals have the right to request access to CCTV footage relating to themselves under the UK GDPR and the Data Protection Act 2018.

7.2 All requests should be made to the school, verbally or via email: [add email for your school]. 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.

7.3 The Headteacher must contact the Chief Operating Officer and DPO immediately for advice.

7.4 The school will respond to requests within 1 month of receipt. Schools are advised to investigate and respond promptly to avoid the footage being overwritten.

7.5 Under data protection legislation, a fee is not normally charged, although a reasonable fee based on the administrative cost of providing the data can be charged when a request is manifestly unfounded or excessive, particularly if it is repetitive.

7.6 The school reserves the right to refuse access to CCTV images and sound footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

## 8 Access to and Disclosure of Images to Third Parties

8.1 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). These will be actioned once an information request has been submitted and guidance from the DPO has been sought.

8.2 Any parent requests should be made to the school, verbally or via email: [add email for your school], marked for the Headteacher's attention and treated as a Subject Access Request. Parents can view the footage, but only if no other pupil(s)' images are on view. Redacted screen prints should be considered as an alternative.

8.3 Any access by staff should comply with the following: live footage should only be seen by staff managing or monitoring the system/cameras, with the delegated authority of the Headteacher. Recording systems must be located in areas of reduced access, to avoid potential tampering.

8.4 The data may be used within the Trust's Discipline and Grievance Policies and Procedures, as required, and will be subject to the usual confidentiality requirements of those procedures.

## 9 Complaints

9.1 Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance, who will consult with the Data Protection Officer, and act in accordance with the Trust Complaints Policy and Procedures.

## 10 Further Information

10.1 Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition V1.2 2017 (published by the Information Commissioners Office) [www.ico.org.uk](http://www.ico.org.uk)
- Surveillance Cameras Commissioner <https://www.gov.uk/government/organisations/surveillance-camera-commissioner>
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018
- UK GDPR





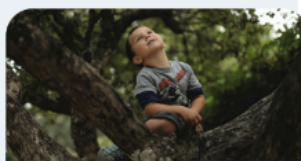
Our mission is to be a community of outstanding schools in which our pupils flourish in safe, happy and stimulating environments and leave us with the knowledge and skills, personal qualities and aspirations, to make the world a better place, inspired by the gospel.



### Collaboration

We are one team, being the best we can be. We achieve more altogether - one Trust, one family of schools, one community.

We are united through our faith, families and staff.



### Ambition

We want our children to be happy and to flourish, achieving well.

Across all areas, we work as one team to drive up standards. We are courageous in our decision making and aspirations.

Through the strength of our ambition, we create a distinct brand and culture.



### Stewardship

Justice, forgiveness and integrity are central to the gospels and drive our decision-making. Underpinning this is a relentless approach to safety, reliability and consistency.

As key influencers of our children's impact on society and the environment, we encourage sustainable and brave decision-making, based on a beliefs-led approach.



### Trust

We are authentic, transparent, open and honest.

Through compassion and kindness, we show humility to each other.

