



PORTSDOWN
Primary School & Early Years

CCTV Policy

Portsmouth Primary School and Early Years

Approved by:	Governing Board	Date: September 2025
Last reviewed on:	September 2025	
Next review due by:	May 2027	

1. Introduction

Portsmouth Primary School and Early Years uses Closed Circuit Television (CCTV) within school premises. This policy sets out the purpose, use and management of CCTV at the school and ensures that it is used in compliance with current legislation, including the UK GDPR, the Data Protection Act 2018, the Data (Use and Access) Act 2025, the Protection of Freedoms Act 2012, and the Surveillance Camera Code of Practice (2021).

2. Definitions

For the purpose of this policy, 'CCTV' refers to fixed cameras operating across school premises, used for the purpose of safety, security, and safeguarding.

3. Purpose of CCTV

The purpose of CCTV in Portsmouth Primary School is to:

- Protect pupils, staff, visitors and property.
- Assist in identifying persons who have committed an offence.
- Provide evidence for investigations.
- Support the effective management of the school site.

4. Legal Framework

This policy is based on the following legislation and guidance:

- UK GDPR and Data Protection Act 2018.
- Data (Use and Access) Act 2025.
- Protection of Freedoms Act 2012.
- Surveillance Camera Code of Practice 2021 (Home Office).
- ICO guidance: 'In the Picture: A Data Protection Code of Practice for Surveillance Cameras' (2017) and 'Video Surveillance Guidance' (2022).

5. Data Protection and Subject Access

The school is the Data Controller for CCTV images. The Data Protection Officer (DPO) oversees compliance.

Individuals have the right to request access to CCTV footage relating to themselves under Subject Access Request (SAR) procedures. Requests will be handled in line with UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act 2025, including provisions to 'stop the clock' where necessary. Footage containing third parties will only be disclosed where lawful and proportionate.

6. Automated Decision-Making

The school does not use CCTV systems to make automated decisions. Any future introduction of analytics or automated alerts will be subject to a Data Protection Impact Assessment (DPIA), ensuring compliance with the Data (Use and Access) Act 2025.

7. Retention of CCTV Footage

CCTV footage will be retained for no longer than 31 days unless required for an ongoing investigation, legal proceedings, or safeguarding purposes. Footage will then be securely deleted.

8. Data Protection Impact Assessments (DPIAs)

The school will conduct a DPIA before the installation of new CCTV equipment or significant changes to the existing system. This ensures that privacy risks are assessed and minimised.

9. Signage and Transparency

Clear signage is displayed around the school to inform staff, pupils, and visitors that CCTV is in operation. The school community is regularly informed of the purpose and use of CCTV.

10. Access to CCTV Footage

Access to CCTV footage is strictly controlled. Only authorised staff may view live or recorded footage. Disclosures to third parties will only occur where lawful and proportionate, for example to law enforcement authorities.

11. Covert Monitoring

Covert monitoring may only be undertaken in exceptional circumstances where there is suspicion of criminal activity or serious misconduct, with prior approval from the Headteacher and the Governing Board, and always in accordance with the law.

12. Roles and Responsibilities

- The Governing Board oversees the policy and ensures compliance.
- The Headteacher is responsible for day-to-day management of the system.
- The Data Protection Officer (DPO) monitors compliance with data protection law.
- Authorised staff operate the CCTV system in accordance with this policy.

13. Review

This policy will be reviewed every two years, or sooner if significant legal or technological changes occur.

Appendix A – Staff Quick Reference Checklist

CCTV System Use and Responsibilities

- The CCTV system and the images produced are controlled by the **School's Site Manager**.
 - The school has considered the need for using CCTV and has decided it is required for:
 - Prevention and detection of crime
 - Protecting the safety of staff, pupils, and visitors
 - CCTV will **not be used for other purposes**.
 - An **annual review** of CCTV use will be conducted.
 - The Site Manager is responsible for:
 - How the system is used
 - Notifying the Information Commissioner about the CCTV system and its purpose (legal requirement under UK GDPR/Data Protection Act 2018)
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Appendix B – CCTV Signage

It is a requirement under the **UK GDPR, Data Protection Act 2018**, and the **Surveillance Camera Code of Practice (2021)** that people entering a CCTV-protected area are notified that the area is monitored and that images are being recorded.

The school ensures this requirement is fulfilled by displaying clear and visible signs at the entrances and within areas covered by CCTV.

Each CCTV sign should include:

- A statement that the area is covered by CCTV surveillance and that images are being recorded
- The purpose(s) of using CCTV (e.g., safeguarding, safety, crime prevention, protection of property)
- The name of the school (**Portsmouth Primary School and Early Years**)
- A contact point for enquiries (telephone number or school office address)

Sample CCTV Sign Wording:

CCTV in Operation

Images are being recorded for the purposes of:

- Safeguarding pupils, staff, and visitors
- Crime prevention and detection
- Protection of school property

Portsmouth Primary School and Early Years

For enquiries, please contact: 023 92 XXX XXX or office@portsdownprimary.co.uk

Appendix C – CCTV Data Protection Impact Assessment (DPIA) Template

Purpose of this assessment:

This template must be completed before installing new CCTV cameras or making significant changes to the system, in line with **UK GDPR, Data Protection Act 2018**, and the **Surveillance Camera Code of Practice (2021)**.

Section 1: Project details

- Name of project/proposal
- Date of assessment
- Completed by
- Reviewed by (DPO)
- Approved by (Headteacher/Governing Board)

Section 2: Description of CCTV use

- What is being proposed?
- Purpose of the system

- Location(s) of cameras and areas covered
- Whether audio recording is proposed (normally not permitted)

Section 3: Legal basis

- Identify the lawful basis under UK GDPR
- Reference relevant statutory obligations

Section 4: Necessity and proportionality

- Why is CCTV necessary in this area?
- Are there less intrusive alternatives?
- How will footage be used and who will have access?

Section 5: Risks to individuals

- Risk of capturing images unnecessarily
- Risk of excessive retention
- Risk of unauthorised access or misuse
- Risk of distress or concern among individuals

Section 6: Measures to reduce risks

- Clear signage and privacy notices
- Secure storage and access controls
- Strict retention and deletion policy
- Staff training
- Regular review of necessity

Section 7: Consultation

- Have pupils, parents, staff, or unions been consulted?
- Have safeguarding leads and governors been informed?

Section 8: Outcomes and actions

- Summary of benefits vs risks
- Actions required before implementation
- Review date for this DPIA
- Signed (Headteacher/Chair of Governors):
- Date: