

CCTV Policy

Warrington St Ann's CE Primary School

Date: May 2026

Review date: May 2027

1. Purpose of this Policy

This policy sets out how Warrington St. Ann's CE Primary School uses Closed-Circuit Television (CCTV) systems in line with data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The school uses CCTV to ensure that it operates a safe and secure environment for pupils, staff, visitors and property.

2. Purpose of CCTV Use

The CCTV system is installed for the following purposes:

- To protect school property and assets
- To prevent and detect crime, including vandalism
- To assist in maintaining the safety and security of pupils, staff, and visitors

The system is not used for general monitoring of staff or pupils.

3. Location and Coverage

- Cameras are located externally on the school building only
- Coverage is limited to areas necessary for security purposes, such as:
 - Entrances and exits
 - Perimeter areas

The system is designed to be proportionate, avoiding unnecessary intrusion into private areas or neighbouring properties.

4. Lawful Basis for Processing

The lawful basis for processing personal data via CCTV is:

- Article 6(1)(e) – Public task
Processing is necessary for the performance of a task carried out in the public interest, namely safeguarding the school environment and protecting property.

The school has determined that:

- CCTV use is necessary for security purposes
 - Its use is proportionate and limited to what is required
 - Less intrusive measures would not achieve the same level of protection
-

5. Operation of the System

- The CCTV system operates continuously (24/7)
- Footage is recorded digitally and stored on a secure system

The system is used solely for the purposes set out in this policy.

6. Storage and Retention

- CCTV recordings are stored on the site maintenance officer's secure computer, located in his office
- Footage is retained for approximately 14 days – it records over when the memory is full
- After this period, recordings are automatically deleted, unless required for an investigation

Retention periods are set to ensure that data is not kept longer than necessary.

7. Access to CCTV Footage

Access to live or recorded footage is strictly controlled and limited to:

- Site Maintenance Officer
- Head Teacher
- Deputy Head Teacher
- School Business Manager

Access is only permitted:

- For legitimate purposes (e.g. investigating incidents, safeguarding concerns, or security matters)
- On a need-to-know basis

All access is subject to confidentiality requirements.

8. Data Security

The school ensures that:

- CCTV data is stored securely
 - Access to the system is password protected
 - Only authorised staff can view or retrieve footage
 - Footage is not shared with third parties except where lawful (e.g., police investigation)
-

9. Transparency and Signage

- Clear signage is displayed at school entrances and around the site
- Signs inform individuals that CCTV is in operation and state the purpose (security)

This ensures compliance with the principle of fair and transparent processing.

10. Data Subject Rights

Individuals have rights under data protection law, including:

- The right to request access to personal data (Subject Access Request)
- The right to request erasure or restriction (where applicable)

Requests should be made to the school office. The school will respond within statutory timeframes.

11. Data Protection Impact Assessment (DPIA)

The school has carried out a Data Protection Impact Assessment to ensure that:

- The use of CCTV is justified
 - Risks to individuals' privacy are identified and mitigated
 - The system remains necessary and proportionate
-

12. Review of the Policy

This policy will be reviewed annually or sooner if:

- There are changes to legislation
 - The CCTV system is significantly altered
-

13. Contact

For further information about this policy or how CCTV data is used, please contact:

Head Teacher / Data Protection Lead

Mrs K. Keen via the school Office or by email to office@wstanns.co.uk

Data Protection Impact Assessment (DPIA)

CCTV System – External Security Monitoring
Warrington St Ann's CE Primary School

1. Project / Processing Overview

Project name:

CCTV system – external security monitoring

Description of processing:

The school operates a CCTV system with cameras installed on the exterior of the building. The system records video footage of areas around the school perimeter.

Footage is:

- Continuously recorded (24/7)
- Stored digitally on a secure computer in the site maintenance officer's office
- Retained for approximately 14 days before automatic over recording

Purpose(s) of processing:

- Protect school property and assets
 - Prevent and detect crime or vandalism
 - Support the safety and security of pupils, staff and visitors
-

2. Lawful Basis

UK GDPR Article 6 lawful basis:

- ✓ **Article 6(1)(e) – Public task**

Explanation:

The processing is necessary for the school to perform its public functions, including safeguarding its environment and protecting property.

3. Data Being Processed

Type of personal data:

- Video images of individuals (pupils, staff, visitors, passers-by)

Special category data:

- Not intentionally collected
- May be incidentally captured (e.g. images revealing characteristics)

Criminal offence data:

- May be processed if footage is used in relation to incidents (e.g. vandalism)
-

4. Necessity and Proportionality

Why is CCTV necessary?

- There is a clear risk of damage, trespass and vandalism
- CCTV acts as both:
 - A deterrent, and
 - A tool for investigation

Less intrusive measures (e.g. signage, physical security alone) are not sufficient.

Why is the approach proportionate?

- Cameras are:
 - ✓ External only
 - ✓ Directed at specific security-sensitive areas (entrances, perimeter)
 - The system:
 - ✓ Does not monitor classrooms or internal areas
 - ✓ Is not used for routine staff or pupil monitoring
 - Footage retention is:
 - ✓ Limited to approximately 14 days
-

5. Individuals Affected

- Pupils

- Staff
 - Parents and visitors
 - Members of the public near the school site
-

6. Consultation

Internal consultation:

- Head Teacher
- Senior Leadership Team
- Site Maintenance Officer
- School Business Manager

External consultation:

- Not required at this stage
 - ICO guidance followed in implementation
-

7. Risks to Individuals' Rights and Freedoms

Risk	Description
Unnecessary intrusion	Individuals recorded without awareness
Excessive surveillance	Recording beyond what is needed
Misuse of footage	Unauthorised access or inappropriate use
Data breach	Loss or unauthorised disclosure of images
Over-retention	Keeping footage longer than necessary

8. Measures to Mitigate Risks

Risk	Mitigation Measures
Lack of awareness	Clear CCTV signage displayed on site
Excessive surveillance	Cameras restricted to external areas only

Misuse of footage	Access limited to authorised staff only
Data breach	Password-protected system and secure storage
Over-retention	Automatic deletion after 14 days
Lack of transparency	CCTV policy and privacy information available

9. Access Controls

Access to CCTV footage is restricted to:

- Site Maintenance Officer
- Head Teacher
- Deputy Head Teacher
- School Business Manager

Access is:

- Logged where appropriate
 - Limited to legitimate purposes (e.g. investigating incidents)
-

10. Data Sharing

Footage may be shared with:

- Police or law enforcement agencies (where required)
- Other authorities where legally necessary

Footage is not shared routinely or for non-security purposes.

11. Storage and Security

- Stored on a secure computer in a restricted office
 - Protected by:
 - Password access
 - Physical security of the location
 - No remote or public access
-

12. Retention

- Footage retained for approximately 14 days
 - Automatically recorded over after this period
 - Exceptions:
 - Footage may be retained longer if required for investigation
-

13. Data Subject Rights

Individuals have rights including:

- Access to their personal data (SAR)
- Right to restriction or erasure (where applicable)

Requests are handled in accordance with school data protection procedures.

14. Outcome of DPIA

✓ The use of CCTV is:

- Lawful (public task)
- Necessary for security purposes
- Proportionate to the risks identified
- Supported by safeguards to protect individuals' privacy

Conclusion:

The system can proceed, subject to ongoing review.

15. Review

- DPIA reviewed 5/5/2026
 - DPIA review date: May 2027
 - Review required if:
 - System changes (e.g. new cameras, extended coverage)
 - New risks identified
 - Changes in legislation or guidance
-

16. Approval

Name	Role	Signature	Date
Mrs K. Keen	Head Teacher		
Mrs A. Gatley	School Business Manager		
Mrs K. Keen	Data Protection Lead		
Mr. A. Cameron	Site Maintenance Officer		

CCTV Privacy Notice

Warrington St. Ann's CE Primary School uses CCTV cameras on the external areas of the school site to help keep pupils, staff, visitors and property safe and secure. The system is used to prevent and detect crime and vandalism and is not used for general monitoring. Images may capture individuals on or near the school premises. The lawful basis for this processing is that it is necessary for the school to carry out its public task in the public interest. Footage is securely stored and retained for approximately 14 days before automatic over recording, unless required for investigation. Access to footage is restricted to authorised staff only and may be shared with law enforcement where appropriate. Further information about how we use CCTV and your data protection rights is available in our CCTV Policy or by contacting the school office.