



Townlands C of E Primary Academy

CCTV Policy

Approved by: Rachael Johnson (Chair of Governors)

Date: March 2026

Next review due by: March 2028

CCTV policy

Townlands uses closed-circuit television (CCTV) to protect the safety of students, staff, parents/carers and visitors.

This policy outlines how Townlands uses CCTV in line with the principles set out within the Surveillance Camera Code of Practice 2021. All personal data obtained is stored in accordance with the UK General Data Protection Regulations (UKGDPR) and the Data Protection Act 2018.

Purpose

The CCTV recordings may be used for:

- prevention and detection of crimes, on the premises
- student behaviour management, discipline and exclusions
- staff disciplinary and associated processes and appeals
- maintaining a safe environment for the whole Townlands community

CCTV system operation

The CCTV system will be operational 24 hours a day, 365 days a year.

The Data Controller is registered with the Information Commissioner's Office.

The system does not record audio except one camera in the main foyer. All recordings will have date and time stamps.

Location of cameras

The cameras are located in places that require monitoring in order to achieve the purpose of the CCTV system.

Appropriate signs are displayed around Townlands premises within prominent locations that identify that CCTV recording is in operation.

Signs are located at the entrance gate, building entrance, inside reception and around the school exterior.

General access to CCTV footage

It will not be common practice to release CCTV footage unless satisfactory evidence for a secure legal basis can be provided. This is authorised within Section 115, Crime and Disorder Act 1998.

In appropriate circumstances, Townlands may allow authorised personnel to view footage where the above purposes are considered.

Townlands will maintain a record of all disclosures.

All access requests should be made in writing to the system manager and headteacher and be specific to a date and time frame.

Any disclosure will be done in line with UK GDPR and Data Protection.

Townlands cannot guarantee disclosure of footage when made under a Subject Access Request due to:

- there is a lack of technical resources available to blur or redact the footage
- the release of the footage would prejudice an ongoing investigation
- other identifiable individuals have not consented

Authorised CCTV system operators

Townlands has limited staff members, who understand the importance of confidentiality, and are authorised to access and operate the CCTV system.

The authorised personnel within Townlands are:

- Headteacher
- Health & Safety/Site Manager - system manager
- Safeguarding & Family Welfare officer
- Office manager
- SENDCo

Storage of footage

Footage will be retained for no longer than necessary to achieve the purposes of the system.

The retention period will be 5 years. At the end of the retention period, the files will be deleted.

On occasion, footage may be retained for longer than 5 years. For example, when a law enforcement body is investigating a crime.

Recordings will be downloaded and encrypted, so that the data will be secure, and its integrity maintained, to ensure it can be used as evidence if required.

All recordings must be logged and traceable throughout their life within the system.

CCTV system security

A full Data Privacy Impact Assessment will be completed upon deployment, replacement, development or upgrading of the CCTV system. This is in line with the UK GDPR principle, Privacy by Design, and ensures the aim of the system is reasonable, necessary and proportionate.

The system will be made secure by the following safeguards:

- the system manager will be responsible for overseeing the security of the footage and recorded images, maintenance and training of authorised personnel
- the system will be checked for faults regularly
- the footage will be stored securely
- the software updates will be installed as soon as possible
- the recorded footage will be password-protected
- the equipment will be located in an area accessible only to authorised personnel

Covert recording

Townlands will only 'covert record' when the following criteria are met:

- an assessment concluded that if we had to inform individuals that recording was taking place it would prejudice our objective
- there is reasonable cause to suspect specific criminal activity or actions that could result in a serious breach of staff or volunteer behaviour expectations is taking place
- covert processing is carried out for a limited and reasonable period and related to specific suspected criminal activity
- if the situation arises where Townlands adopts 'covert recording', there will be a clearly documented procedure which sets out how the decision to record covertly was reached, by whom and the risk of intrusion on individuals

Complaints

Any complaints should be made in writing to the office@townlands.leics.sch.uk