Policy for the Installation and Use of CCTV and Access Control

The Perse School

April 2026

Introduction

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) and Access Control Systems at the Perse School (the **School**). It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the School and members of the public) regarding their rights in relation to personal data recorded via the CCTV system and the audit logs generated by the Access Control systems.

The policy will:

- outline why and how we will use CCTV, and how we will process personal data recorded by CCTV cameras.
- ensure that the legal rights of our pupils, parents, staff, and visitors relating to their personal data are recognised and respected; and
- assist staff in complying with relevant legal obligations when working with personal data.

The CCTV System and Access Control System is administered and managed by the School, which acts as the Data Controller. This policy will be subject to review from time to time and should be read with reference to the School's Data Protection Policy for Staff, Governors and Volunteers and Privacy Notices. For further guidance on CCTV Systems, please review the Information Commissioner's CCTV Code of Practice (accessible here - https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/). If you have any questions about this policy, please contact the Data Processing Manager (dataprotection@perse.co.uk).

The School's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the School believes these purposes are all in its legitimate interests. (see section 1. Data captured for the purposes below will not be used for any commercial purpose).

1. Scope and Use of the CCTV System

The objectives in operating CCTV at the School sites include but are not limited to, the following:

- To protect pupils, staff, volunteers, visitors, and members of the public with regard to their personal safety and to act as a deterrent against crime.
- To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors, and members of the public from damage, disruption, vandalism, and other crime.
- To prevent and detect crime, and support law enforcement bodies in the prevention, detection, and prosecution of crime as well as the identification and apprehension of offenders. To monitor the security and integrity of the School site and deliveries and arrivals, including car parking and number plate recognition.
- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the School Rules, which are available to parents and pupils on the Parent Portal.
- To assist in day-to-day management, including ensuring the health and safety of pupils, parents, staff, and visitors.
- To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
- To assist in civil litigation, including employment tribunal proceedings.

- The School will treat the system, and all information, documents and recordings obtained and used as data which is covered by the School's Data Protection Policy and Privacy Notices.

2. Positioning & Maintenance

Locations for the CCTV cameras have been selected, both inside and outside our premises, that the School reasonably believes require monitoring to address the above objectives.

Adequate signage has been placed in prominent positions around the premises to inform pupils, parents, staff, and visitors that they are entering a monitored area, identifying the School as the controller operating the CCTV system and including contact details for further information regarding the CCTV system.

These locations have been chosen to minimise viewing of spaces not relevant to the legitimate purposes of the School's monitoring. As far as practically possible, CCTV cameras will not focus on private property; and no images of public spaces will be captured except to a limited extent at site entrances. In addition, surveillance systems will not be used to record sound, and no images will be captured from areas in which individuals would have a heightened expectation of privacy, including medical, changing and washroom facilities.

The CCTV system will be operational 24 hours a day, every day of the year.

Authorised personnel will check and confirm that the CCTV system is properly recording and that cameras are functioning correctly on a regular basis.

The CCTV system will be checked and (to the extent necessary) serviced no less than annually.

3. Recorded Images and Storage

- We will ensure that recorded images are only viewed by approved members of staff whose roles require them to have access to such data. This may include security, HR, and safeguarding / pastoral staff. Staff using the CCTV system will be given appropriate training to ensure that they understand and observe the legal requirements related to the processing of relevant data.
- In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered by CCTV cameras is stored in a way that maintains its integrity and security.
- A log must be maintained of any occasion when stored images are viewed, copied, saved for further viewing, or destroyed (see appendix 1– CCTV Log).
- Images will be stored for approximately 5 weeks, and automatically over-written unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.
- Where such data is retained, it will be retained in accordance with our Data Protection Policy and Privacy Notices and will be recorded in the CCTV Log.
- The CCTV system will not be used to record conversations; the current School systems do not allow sound recording.

4. Requests for Disclosure

Individuals have the right to request access to personal data that the School holds about them (otherwise known as a "subject access request", on which please see the School's Privacy Notice and Data Protection Policy for further information), including information collected by the CCTV system, if it has been retained.

In order to respond to a subject access request, the School will require specific details including (as a minimum) the time, date, and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

The School must also be satisfied as to the identity of the person wishing to view stored images and the legitimacy of their request.

No images from our CCTV cameras will be disclosed to a third party without express permission being given by the School. The following are examples of circumstances in which the School may authorise disclosure of CCTV images to third parties:

- Where required to do so by the Head, the Police, or some relevant statutory authority.
- To make a report regarding suspected criminal behaviour or a safeguarding incident.
- To enable a member of the pastoral team to examine pupil behaviour which may give rise to any reasonable safeguarding concern.
- To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian will be informed as part of the School's management of a particular incident.
- To individual data subjects (or their legal representatives) pursuant to an access request (as outlined above).
- To a third-party insurance company to support a claim made by a pupil, parent, or visitor.
- To the School's insurance company where required in order to pursue a claim (for example damage done to insured property); or
- In any other circumstances required under law or regulation.

Where images are disclosed, a record will be made in the CCTV logbook including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).

The School reserves the right to obscure images of third parties when disclosing CCTV footage, where we consider it necessary to do so.

5. Training

The DCOs are trained with regards to:

- The School's Data Protection Policy and subsequent code of practice and are fully conversant with the School's procedure for the control and use of CCTV.

6. Access Control

- The Access Control System is protected from unauthorised access by the use of passwords.
- Requests to view the audit logs need to be authorised by a member of the Executive Leadership Team.

Appendix 1 – CCTV Log

Date	**Action**: viewed, copied, saved, or destroyed	**Detail -** including detail of – Image viewed by… – Dissemination of image to…	**Completed By (DCO)**		**DPC Approval (Signature)** Required for copying or dissemination of images
			(name)	(Signature)	

Appendix 2 – CCTV Dissemination of Images Approval Form

Date of Request:	Data Control Officer:
Request for image made by Name: Contact details: Organisation:	
Detail of Image Date: Times: Detail: Other identifiable persons in the image:	
Purpose of request: (is this consistent with the purpose for which the system was established)	☐ To protect pupils, parents, staff, and visitors with regard to their personal safety and to act as a deterrent against crime. ☐ To protect the School buildings and equipment, and the personal property of pupils, parents, staff and visitors from damage, disruption, vandalism, and other crime. ☐ To prevent and detect crime, and support law enforcement bodies in the prevention, detection, and prosecution of crime as well as the identification and apprehension of offenders. ☐ To monitor the security and integrity of the School site and deliveries and arrivals, including car parking and number plate recognition. To monitor staff and contractors when carrying out work duties. ☐ To monitor and uphold discipline among pupils in line with the School Rules, which are available to parents and pupils on the Parent Portal. ☐ To assist in day-to-day management, including ensuring the health and safety of pupils, parents, staff, and visitors. ☐ To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings. ☐ To assist in civil litigation, including employment tribunal proceedings.
Approval: Request Approved: Name & Signature	☐ Yes ☐ No NB: The School reserves the right to refuse any dissemination request if there are concerns that the recipient may publish the image without written consent from the data subject.
Release: (to be completed by the person receiving the image)	I understand that the copy image provided to me by the Perse School is personal data (as defined by the UK General Data Protection Regulation (UK GDPR)/Data Protection Act 2018 and accept responsibility for the image. I understand that further copying, publication, or processing of this image is prohibited. Name: Signature: Date: