

Policy: CCTV

Reviewed: February 2026

Next review: February 2027

Mid-year updates:

Policy Monitoring

Libra Policies are reviewed when the need arises in line with legislation updates, guidance, and useful information we receive in order to improve and enhance our provision. Additionally, Policies are updated annually by relevant members of staff and the Senior Leadership Team.

Equality Statement

We believe that this policy is in line with the Equality Act as it is fair, it does not prioritise or disadvantage any child or member of staff and it helps to promote equality at this school.

We all have a responsibility to ensure equality permeates into all aspects of school life and that everyone is treated equally irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We want everyone connected with this school to feel safe, secure, valued and of equal worth. We acknowledge the findings of the Race Disparity Audit that clearly shows how people of different ethnicities are treated across the public services of health, education, employment and the criminal justice system.

We wish to work closely with the School Council and to hear their views and opinions as we acknowledge and support Article 12 of the United Nations Convention on the Rights of the Child that children should be encouraged to form and to express their views.

Introduction

The purpose of this policy is to regulate the management and operation of the closed-circuit television (CCTV) system at Libra School. It also serves as a notice and a guide to data subjects (including children, 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 (the system). The system is administered and managed by the school, who act as the Data Controller.

Aims and Objectives:

This Policy covers the use of CCTV systems on the school site, which capture moving and still images of people who could be identified, for the following purposes:

- To protect school buildings, and their assets within.
- To increase personal safety of those within and visiting the school community.
- To act as a deterrent for violent behaviour and damage to the school.
- To support the Police in a bid to deter and detect crime.
- To assist in identifying, apprehending and disciplining offenders.

Objectives of the System

- To protect children, staff, volunteers, visitors and members of the public with regard to their personal safety.
- To protect the school buildings and equipment, and the personal property of children, staff, volunteers, visitors and members of the public.
- To monitor the security and integrity of the school site including deliveries and arrivals.
- To monitor the behaviour of children and deploy staff accordingly.
- To safeguard staff against allegations.
- To deter unauthorised trespass to the school grounds and premises.
- To monitor traffic flow on site.
- To monitor fire drills and evacuations.

Statement of Intent

The school will treat the system, and all information, documents and recordings obtained and used as data, which are protected by the GDPR, and will be processed in accordance with the requirements of the regulation.

Cameras will be used to monitor activities within allocated areas around school to ensure the safety and wellbeing of the school community. The school will only operate overt surveillance and will display signs in the areas of the school where this is in operation. Covert surveillance (i.e. which is intentionally not shared with the individuals being recorded) is not condoned by the school. Warning signs, have been placed at all access routes to areas covered by the school CCTV, as required by the Code of Practice of the Information Commissioner. The CCTV system will not be trained on individuals unless an immediate response to an incident is required. The CCTV system will not be trained on private vehicles or property outside the perimeter of the school.

Cameras are distributed within the school buildings and outside around the buildings, playing fields and car park areas. Libra does not have communal toilet facilities, all toilets are single door, single use toilets. CCTV is not used in the toilets but may be used in the communal hallway near the toilets.

The Data Protection Principles

- Data collected from CCTV will be processed in accordance with the principles of the GDPR. As such, all data will be: Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purpose(s) for which they are processed
- Accurate and where necessary, kept up to date
- Kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed
- Processed in a manner that ensures appropriate security of personal data, including protection against unauthorised or unlawful processing, and against accidental loss, destruction or damage, using appropriate technical and organisational measures.

Data Protection Officer (DPO)

The Data Protection Officer (DPO) is responsible for control of the images and makes decision on how these should be used effectively and in line with guidance, identifying clearly defined and specific purposes for the use of images, this is communicated directly to the person who operates the system. The DPO is also aware that they should do all they can to minimise intrusion for those who may be monitored, and particularly if specific concerns have been expressed.

Operational Control & Protocols

- Access to the CCTV system, software and data, will be strictly limited to authorised operators and is password protected.
- The system will be managed by the senior management team in accordance with the principles and objectives expressed in this policy.
- The day-to-day administration of the system will be the responsibility of authorised staff during the day, out of hours and at weekends.
- The CCTV system will be operated 24 hours a day every day of the year.
- Remote access is in operation and utilised by authorised members of the senior management team, for the purposes of security and safety and for the purposes of liaison with the police, the fire service and medical personnel as well as all authorised regulatory bodies.
- The Operations and Logistics manager will check and confirm the efficiency of the system daily and in particular, to confirm that the equipment is properly recording and that cameras are functional.
- In the unlikely event that LIBRA is required to undertake any processing services for an outside organisation such as editing images, a written contract would be required with clearly defined responsibilities to ensure that the images are only processed in accordance with strict instructions. The contract would also need to include guarantees about security such as storage and the use of properly trained staff.
- All staff involved with the operation of the CCTV system will be properly trained and fully understand their roles and responsibilities in respect of data protection e.g.:
 - the user's security policy (procedures for access to recorded images)
 - the user's disclosure policy

- rights of individuals in relation to their recorded images.
- Access to the CCTV 'viewing monitors' will be limited to selected authorised staff together with those directly involved in the security of the school.

Recorded Material Procedures

- To maintain and preserve the integrity of the recorded material used to record events from the CCTV system, and the facility to use them in any future proceedings, the following procedures for their use and retention will be strictly adhered to:
- The system will register the date and time of recorded material.
- Any recorded material required for evidential purposes must be sealed, witnessed, signed by the DPO, dated and stored in a separate, secure recorded material store.
- If recorded material is not copied for the Police before it is sealed, a copy may be made later, it will then be resealed, witnessed, signed by the DPO, dated and returned to the evidence material store.
- If the recorded material is archived the reference will be noted.
- Recorded materials may be viewed by / released to third parties, only in the following prescribed circumstances, and then only to the extent required by law:
 - The police, where any images recorded would assist in a specific criminal inquiry
 - Prosecution agencies, such as the Crown Prosecution Service (CPS)
 - Relevant legal representatives such as lawyers and barristers
 - Persons whose images have been recorded and retained, and where disclosure is required by virtue of data protection legislation, or the Freedom of Information Act.

A record will be maintained of the release of recorded materials to the Police or other authorised applicants. A register, maintained by the DPO will be made available for this purpose. Viewing of recorded materials by the Police will be recorded in writing and in a logbook. Recorded materials will be released to the Police but will remain the property of the school, and both the recorded material and information contained on it are to be treated in accordance with this document. The school retains the right to refuse permission for the Police to pass to any other person, the recorded material or any part of the information contained thereon. Upon a court of law request the release of an original recorded material will be produced from the secure recorded material store, complete in its sealed bag. If the Police require the school to retain the stored recorded materials for use as evidence in the future, such recorded materials will be properly indexed and properly and securely stored until they are required by the Police. Requests for access or disclosure will be recorded, and the principal will make the final decision as to whether the recorded images may be released to persons other than the police.

Parental Access

Libra is not able to provide CCTV footage of their child if other children or staff can be seen in the footage due to quite clear data protection requirements. Parents can make subject access requests under data protection laws to access CCTV footage, and these will be subject to consideration by our Data Protection Officer.

Responsibilities

The Directors and Estates Manager will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within school
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access (e.g. an access log) to the release of any material recorded or stored in the system
- Ensure that monitoring records are not duplicated for release
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Consider both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment

- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy”
- Ensure that monitoring footage are stored in a secure place with access by authorised personnel only
- Ensure that images/digital recordings are stored for a period not longer than 35 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil).
- Ensure that when a zoom facility on a camera is being used, it is being used for the protection of children or staff only.
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual’s reasonable expectation of privacy in public areas

The Senior Management Team will:

- work in conjunction with the Directors to ensure all school staff, children and parents are aware of and comply with this policy.
- provide an environment that is safe, fun, stimulating and challenging to all children.
- promote an awareness of and respect for a diversity of cultures, values, beliefs and abilities.
- encourage parents to take an active role in policy development where appropriate.
- ensure all relevant risk assessments are in place to ensure a safe school environment.
- provide leadership and vision in respect of equality.
- provide guidance, support and training to all staff.
- consider providing remote learning to children in circumstances when in-person attendance is either not possible or contrary to government guidance in accordance with school risk assessments and safeguarding guidance. This might include occasions when
- we decide that it is not possible for the school to open safely, or that opening would contradict guidance from local or central government.
- individual children, for a short period, are unable to physically attend school but are able to continue learning.
- monitor and evidence the effectiveness of this policy.

The Data Protection Officer (DPO) will:

- attend appropriate training as required, or where an External DPO is employed, they will have relevant training and advise our internal DPO accordingly.
- oversee and control all aspects of the use of surveillance CCTV and data collected from it
- know how to deal with request for CCTV images
- record all requests for CCTV images
- monitor the effectiveness and impact of the CCTV system on the school community
- have expert knowledge of data protection law and practices
- inform the school and school personnel about their obligations to comply with the GDPR and other data protection laws
- ensure data management is strengthened and unified
- monitor compliance with the GDPR and other data protection laws
- manage internal data protection activities
- ensure risk and impact assessments are conducted in accordance with ICO guidance
- report data breaches within 72 hours
- ensure individuals have greater control over their personal data
- ensure that prior to the processing of an individual's data that:
 - the process is in line with ICO guidance
 - the process is transparent
 - the individual will be notified
 - the notification is written in a form that is understandable to children
 - when sharing an individual's data to a third party outside of school that details for the sharing are clearly defined within the notifications.

- share an individual's data where it is a legal requirement to provide such information
- process all written subject access requests from individuals in line with the External Data Protection Officer's guidance
- have in place a formal contract or service level agreement with a chosen data processor who is GDPR compliant
- ensure the secure disposal of redundant data and IT hardware holding data in compliance with ICO guidance
- conduct audits where necessary, with the External Data Protection Officer on a timescale advised by them.
- be the first point of contact for supervisory authorities and for individuals whose data is processed
- keep up to date documentation of all data protection activities

Teaching and Learning Support Staff will:

- comply with all aspects of this policy.
- implement the school's equalities policy and schemes.
- report and deal with all incidents of discrimination.
- attend appropriate training sessions.
- report any concerns they have about any aspect of the school community.
- receive relevant training, periodically and ongoing as required, according to their role.
- have equal chances of training, career development and promotion.
- receive equal opportunities training on induction in order to improve their understanding of the current Equality Act and its implications.

Linked Policies and documents:

Health & Safety Policy / Risk Assessments / Data Protection Policy / Photographic and Video Images (Use of)

Policy Location

This policy can be found:

- on SharePoint within the staff and master's folder
- on the school website www.libraschool.co.uk
- on the safeguarding board in reception
- available upon request from the office: admin@libraschool.co.uk / 01598 740044

Lead Assessor: Joan Wilkes



Date: 13.02.26