

CCTV Policy

St Mary's School, Hampstead

September 2026

1 Introduction

- 1.1 This policy sets out how St Mary's School, Hampstead (the **School**) will manage the operation and use of CCTV.
- 1.2 The purposes of this policy are:
 - 1.2.1 to help the School to regulate and manage its use of CCTV;
 - 1.2.2 to help the School be transparent about how the School uses CCTV;
 - 1.2.3 to help ensure that the use of CCTV remains a proportionate and justified response to the problems that it seeks to address; and
 - 1.2.4 to provide guidance for all School staff on how to comply with data protection legislation in relation to the use of CCTV.
- 1.3 This policy applies to all staff working for or providing voluntary support to the School, regardless of whether they are directly or indirectly involved. This includes employees, governors, contractors, agency staff, work experience / gap year / placement students and volunteers.
- 1.4 This policy is published on the School's website and is available on request from the School Office (office@stmh.co.uk / 020 7435 1868).
- 1.5 Staff should read this policy alongside the School's Information Security Policy and Data Protection Policy: Practical Guidance for Staff.

2 The use of CCTV

- 2.1 The School's CCTV system comprises a number of cameras located on the School premises.
- 2.2 The School uses CCTV for the following purposes:
 - 2.2.1 to safeguard the welfare of pupils, parents, staff and visitors;
 - 2.2.2 to protect the School, pupils, parents, staff and visitors from criminal activity such as theft and vandalism;
 - 2.2.3 to increase personal safety;
 - 2.2.4 to support the protection of property;
 - 2.2.5 to aid in the investigation of accidents, incidents and breaches of our rules and policies;
 - 2.2.6 to assist the School with its health and safety obligations; and
 - 2.2.7 to support law enforcement agencies in the reduction, prevention and detection of crime and to assist in the identification, apprehension and potentially prosecution of offenders.
- 2.3 CCTV footage may contain the personal information of those individuals captured by the recording.

3 Governance

3.1 The Bursar has overall responsibility for the management and operation of the CCTV and the implementation of this policy.

3.2 The Bursar will ensure that the CCTV system is operated according to this policy.

4 Minimising privacy risks

4.1 The School has carried out a Data Protection Impact Assessment (DPIA) on the use of CCTV. The outcome of the DPIA was that the use of CCTV is a necessary and proportionate measure to achieve the purposes listed above, as long as certain measures are put in place to mitigate the risks.

4.2 The School appreciates that the use of CCTV impacts on individuals' privacy but considers this intrusion to be justified because less privacy intrusive methods would not be sufficient to meet the School's purposes for using CCTV. In coming to this conclusion, the School has had particular regard to the safeguarding and welfare duties it owes to pupils.

4.3 The School will also review its use of CCTV should a concern or complaint be raised about its practices.

5 The operation of CCTV

5.1 The School has placed cameras to monitor only necessary areas, for example, not neighbouring private residences.

5.2 Where CCTV cameras are placed on the School premises, we display signs to alert individuals that their image may be recorded. Such signs will identify the School as the organisation operating the system, identify the purpose for using the surveillance system and who to contact for further information, where these things are not obvious to those being monitored.

5.3 CCTV is not used in areas with a heightened expectation of privacy, for example, toilets or changing rooms.

5.4 The cameras have been positioned in a way to ensure their security and to protect them from vandalism.

5.5 The School has ensured that the cameras can produce images of the necessary clarity and quality to meet the School's purposes.

5.6 Images can be easily extracted from the system if required, for example, under a disclosure to law enforcement agencies and / or under a subject access request (SAR) (please below).

5.7 The School can obscure parts of the images to protect individuals' identities where necessary.

5.8 The CCTV does not capture sound recordings.

5.9 The CCTV cameras that record the perimeter of the School site are in operation 24 hours a day every day of the year to meet the purposes for which they were installed, for example, to identify unauthorised access.

5.10 The School is solely responsible for operating all CCTV in line with this policy and for the purposes identified above.

- 5.11 We will not engage in covert monitoring or surveillance unless, in exceptional circumstances, there are reasonable grounds to suspect that criminal activity or another serious concern, and we reasonably believe there is no less intrusive way to tackle the issue.
- 5.12 In the unlikely event that covert monitoring is considered to be justified, the School will carry out a Data Protection Impact Assessment (please see section 4 above for more information). The rights of individuals whose images may be captured will always be taken into account in reaching any such decision. In the unlikely event that covert monitoring is considered to be justified, the School will carry out a DPIA or update its existing DPIA. The rights of individuals whose images may be captured will always be taken into account in reaching any such decision.

6 Maintenance of the CCTV equipment

- 6.1 The Network Manager/IT Technician will check on a weekly basis that the system is operating effectively. Any software updates will be applied by the Network Manager.
- 6.2 The system will be regularly serviced and maintained to ensure that clear images are recorded. If any defects are found these will be reported to the Network Manager for rectification.
- 6.3 The School will monitor the operation of the CCTV system by investigating any notifications or concerns about its functionality.

7 Storage and security

- 7.1 The CCTV footage will be stored securely and will only be accessed by designated School staff, being the Premises Manager, the Network Manager, and members of the Senior Leadership Team (**Designated Staff**). Office staff monitor the live CCTV footage. Other staff may view the CCTV footage as and when required in exceptional circumstances with the permission of the Designated Staff. Designated Staff will be given additional training on CCTV, as appropriate.
- 7.2 CCTV recordings, including any copies made, are encrypted.
- 7.3 The Designated Staff are trained in the School's security procedures. The Designated Staff will ensure that camera footage is not accessed by any unauthorised person.
- 7.4 The only locations where CCTV footage can be viewed are in selected private and secure offices. The monitors which live stream the CCTV footage in areas where they can be viewed by the staff monitoring them but are not easily visible to other staff.
- 7.5 Only Designated Staff are authorised to make copies (electronic or paper) of the CCTV footage.
- 7.6 Only the Designated Staff may allow external persons or agencies to view the CCTV footage (see below).
- 7.7 Any personal data breach, for example, any unauthorised access to CCTV footage, must be reported immediately to the Bursar in accordance with the School's Information Security Policy.
- 7.8 All maintenance of ICT or CCTV equipment which could provide access to CCTV footage will only be carried out by the Designated Staff.
- 7.9 Staff should note that any misuse of the CCTV system might constitute a criminal offence, for example, accessing footage without authorisation from Designated Staff.

- 7.10 Where footage is saved following an incident this will be done securely.

8 Internal use of the CCTV

- 8.1 If a member of staff considers that CCTV footage might be needed for an internal matter, for example, a pupil disciplinary issue, they should speak to the Bursar in the first instance.

9 Retention

- 9.1 Compliance with data protection law means that the School does not retain personal data for longer than is necessary. Recorded images will normally be retained for 14 days from the date of recording in accordance with the School's Information and Records Retention Policy.
- 9.2 The School has procedures in place to retain information for a longer period if required, for example, where an incident captured by CCTV is under investigation.
- 9.3 The School may permanently delete images after a shorter period, for example where it can be determined that there has been no incident requiring retention of the recorded images.
- 9.4 The School has procedures in place to ensure that information is disposed of securely. This is the responsibility of the Bursar and the Network Manager.

10 Informing individuals about the use of CCTV

- 10.1 The School appreciates the importance of being open and transparent about the use of CCTV.
- 10.2 The School's privacy notices for staff, parents and pupils include information about the use of CCTV, by the School, including for what purpose it is used. A copy of the privacy notices can be found on the School's website.
- 10.3 There are prominently displayed signs in areas where CCTV is in operation, for example, at all access routes into and out of the School. These signs can be seen before entering the areas covered by the cameras.

11 Subject access requests (SARs) and other data protection rights

- 11.1 The School has procedures in place to respond to individuals' requests under data protection law involving CCTV footage, for example, SARs and right to erasure requests. More information about individuals' rights can be found in the School's privacy notices.
- 11.2 Any data protection request in relation to recorded CCTV images should include the date and time of the recording, the location where the footage was captured and, if a SAR, information to allow us to identify the individual, for example, what they were wearing.
- 11.3 We reserve the right to obscure images of third parties when disclosing CCTV footage as part of our response, where we consider it necessary. We also reserve the right to provide still images rather than a recording, where appropriate.
- 11.4 Members of staff have been trained to recognise when an individual is exercising a data protection right and understand that such a request may cover CCTV footage. Staff must refer all rights requests to the Bursar immediately because such requests are complex and there is a statutory timeframe for the School's response.

12 Disclosure to law enforcement agencies

- 12.1 Applications received from third parties to view footage must be referred by staff to the Bursar.
- 12.2 Images from the CCTV system may be disclosed to third parties, for example, the police, where the School deems it necessary, for example, for the prevention and detection of crime. However, any such disclosure will only be in accordance with data protection law. Requests from third parties should be referred to Bursar.
- 12.3 If CCTV footage is disclosed to a third party, the School will record what information was disclosed, when the disclosure occurred, to whom the information was disclosed, and for what purpose(s).
- 12.4 The School will ensure that the disclosure of CCTV footage is carried out securely. The precise method of communication will be determined by the Bursar.
- 12.5 CCTV footage may be disclosed in other circumstances if this is in accordance with data protection legislation. For example, if required by a court order or if in connection with legal proceedings.
- 12.6 CCTV footage will not be made available to the media for commercial or entertainment purposes.

13 Processors

- 13.1 The School is required to have a written agreement in place with any organisation that handles the CCTV footage on its behalf (known as processors under data protection law), for example, if the School uses a third party to store CCTV images on its behalf. The School will carry out checks on the processor to ensure that they understand and comply with data protection in practice.

14 Breaches of this policy

- 14.1 If staff consider that this policy is not being followed in any respect, they must inform the Bursar immediately.
- 14.2 Any breach of this policy by a member of staff will be taken seriously and may result in disciplinary action.

15 Complaints

- 15.1 Any complaints or concerns about the use of CCTV by the School should be addressed to the Bursar.