

Ton Yr Ywen Primary School CCTV Policy

1. Policy Statement

Ton Yr Ywen Primary School is committed to providing a safe and secure environment for pupils, staff, parents, visitors, and contractors. The school uses Closed Circuit Television (CCTV) to help protect the school community, safeguard property, prevent and detect crime, and ensure the safety and welfare of all site users.

This policy explains how CCTV is managed in accordance with **UK GDPR** and the **Data Protection Act 2018**, which regulate the processing of personal data captured via CCTV systems.

2. Legal Framework

This policy reflects requirements and guidance from:

- **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.
- **Department for Education Data Protection in Schools Guidance (2025)**, which sets out compliance duties and expectations for maintained schools.
- Relevant surveillance guidance issued by the **Information Commissioner's Office (ICO)**.
- Sector model documentation such as the **National Education Union (NEU) CCTV model policy**, which provides a framework for use of CCTV in schools.

3. Purpose of CCTV

CCTV at Ton Yr Ywen Primary School is used for the following lawful and legitimate purposes:

- To safeguard pupils, staff, and visitors.
- To protect school property and assets.
- To deter criminal or anti-social behaviour.
- To assist in investigating incidents on school grounds.
- To support the school's security procedures.

All purposes must be necessary, proportionate, and documented, as required by UK GDPR.

4. Data Protection Principles

CCTV usage must comply with data protection principles, ensuring:

- **Lawful, fair, and transparent processing** of personal data.
- **Data minimisation**, including avoidance of capturing areas where privacy is expected (e.g., toilets, changing areas).
- **Accuracy**, ensuring systems record clearly and reliably.
- **Storage limitation**, meaning footage is retained only as long as necessary.
- **Security** of stored footage and access controls.
- **Accountability**, with decisions documented in a DPIA.

5. Data Protection Impact Assessment (DPIA)

The school will conduct a **Data Protection Impact Assessment (DPIA)** before installing new CCTV or making changes to existing systems (post creation of this policy February 2026).

A DPIA will:

- Identify privacy risks.
- Consider the necessity and proportionality of CCTV in each location.
- Ensure cameras avoid excessive intrusion (e.g., into classrooms unless essential).
- Document retention periods and access controls.
- Record mitigation measures.

This process is required under UK GDPR for surveillance systems.

The CCTV system was last updated in Ton Yr Ywen Primary School during 2025.

6. Location of Cameras

Cameras are positioned in clearly defined areas such as:

- External entrances and exits
- Inside the main entrance to the school in the Reception Foyer area and in the entrance to the lower school building.
- Playgrounds and external grounds.
- Car parks and perimeter fencing

The school has and will continue to ensure no camera is placed in a location where individuals have a reasonable expectation of privacy. This is consistent with standard surveillance codes of practice.

7. Signage and Transparency

The school will ensure:

- Clear signage is placed on the school site to inform all those visiting that CCTV is in operation.
- Parents, staff, and visitors are informed through signage and the sharing of this policy on our school website.

8. Operation and Management

The **Headteacher**, supported by the Estates Manager and Cardiff Local Authority approved contractors ensure the:

- Day-to-day management of the CCTV system.
- Compliance with data protection legislation.
- Implementation of access controls and authorisation procedures.

DfE guidance outlines the responsibilities of data controllers and the role of DPOs in ensuring compliance.

9. Storage, Security and Retention

Footage will be stored securely using encrypted systems and protected by appropriate technical and organisational measures.

Retention:

- Footage will typically be retained for **no longer than 30 days**, unless required for an ongoing investigation or legal purpose.
- Access logs will be maintained, detailing who has viewed footage and for what reason.

Only trained, authorised personnel may access CCTV footage.

10. Access to CCTV Footage

Requests for access may be made by:

- **Staff, parents, or members of the public** through a **Subject Access Request (SAR)**.
- **Police** or relevant authorities, where justified and lawful.

DfE guidance outlines how schools must handle SARs for personal data.

The school may refuse disclosure if:

- It would breach the data protection rights of third parties.
- The request falls under exemptions in law.

11. Covert Surveillance

Covert surveillance is **not permitted** unless authorised by senior leadership and only in exceptional circumstances, such as preventing or detecting serious crime. Any such use must comply with relevant legislation such as the **Regulation of Investigatory Powers Act 2000**.

12. Complaints

Complaints regarding the school's CCTV system or compliance with this policy should be addressed in writing to the **Headteacher**.

If unresolved, individuals may escalate concerns to the **Information Commissioner's Office (ICO)**.

13. Monitoring and Review

This policy will be:

- Reviewed **every two years** or earlier if legislation or school needs change.
- Updated following monitoring results, audits, or changes in technology.
- Reviewed alongside the school's Data Protection Policy and other related policies (e.g., Online Safety, School Security)

Last updated February 2026.