



# Rosehill Junior School

## CCTV Policy

January 2026





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## 1. Background

Rosehill Junior School uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.

CCTV surveillance at Rosehill Junior School is intended for the purposes of:

- protecting the school buildings and school assets, both during and after school hours;
- promoting the health and safety of staff, pupils and visitors;
- preventing bullying;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the Police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and ensuring that the school rules are respected so that the school can be properly managed.

The system comprises of **8** fixed cameras.

The CCTV system is owned and operated by the school and the deployment of which is determined by the school's leadership team.

The CCTV is monitored centrally with the following people being permitted access to use it:

- Zowie Norris
- Shaun Smith
- Bridie Turton
- Jessica Rayfield
- Jane Abbott
- Chloe Stansfield
- Natalie Lindley

The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act. This policy outlines the school's use of CCTV and how it complies with the Act.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.



The school complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g., CCTV will not be used for monitoring employee performance.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the school, including Dignity at Work Policy, Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other educational and related legislation.

## **2. Justification for Use of CCTV**

The use of CCTV to control the perimeter of the school buildings for security purposes has been deemed to be justified by the leadership team/governors. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation or of anti- social behaviour.

CCTV systems will not be used to monitor normal teacher/student classroom activity in school.

## **3. Data Protection Impact Assessments**

Where new CCTV systems or cameras are to be installed, Rosehill Junior School will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This may involve the need for consultation with staff, parents and local residents.

If the school installs a new system or upgrades its current CCTV, a new DPIA will be completed.

## **4. Location of Cameras**

Cameras will be sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated.

The school has a full inventory of where cameras are placed.

The school will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include



CCTV will not be used in classrooms.

Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. Rosehill Junior School has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.

Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

CCTV Video Monitoring and Recording of Public Areas may include the following:

- Protection of school buildings and property: The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, office locations, receiving areas for goods/services
- Monitoring of Access Control Systems: Monitor and record restricted access areas at entrances to buildings and other areas
- Verification of Security Alarms: Intrusion alarms, exit door controls, external alarms
- Criminal Investigations (carried out by police): Robbery, burglary and theft surveillance

## **5. Covert Surveillance**

Rosehill Junior School will not engage in covert surveillance.

## **6. Notification**

A copy of this CCTV Policy will be provided on request to staff, students, parents and visitors to the school and will be made available on the school website.

The location of CCTV cameras will also be indicated and adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation.

Adequate signage will also be prominently displayed at the entrance to Rosehill Junior School property. Signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.

Appropriate locations for signage will include:

- at entrances to premises i.e., external doors, school gates
- reception area
- at or close to each internal camera



## **7. Storage & Retention**

The images captured by the CCTV system will be retained for a maximum of 25 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Headteacher. The Headteacher may delegate the administration of the CCTV System to another staff member.

In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

Files/Tapes/DVDs will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel. Similar measures will be employed when using disk storage, with automatic logs of access to the images created.

## **8. Access**

Recorded footage and the monitoring equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel. A log of access to footage will be maintained.

Access to the CCTV system and stored images will be restricted to authorised personnel only.

When accessing images two authorised members of staff must be present. A written record of access will be made. Records of access will be kept.

A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.



In relevant circumstances, CCTV footage may be accessed:

- By the police where Rosehill Junior School (or its agents) are required by law to make a report regarding the commission of a suspected crime; or
- Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on Rosehill Junior School property, or
- To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the Headteacher in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- To data subjects (or their legal representatives), pursuant to a Subject Access Request or
- To individuals (or their legal representatives) subject to a court order.
- To the school insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

## **9. Subject Access Requests (SAR)**

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location. The school will respond to requests within 30 calendar days of receiving the request in line with the school's right of access policy.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

In giving a person a copy of their data, the school provide a still/series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

Where footage contains images relating to 3<sup>rd</sup> parties, the school will take appropriate steps to mask and protect the identities of those individuals.



## 10. Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.

## 11. Staff Training

Staff authorised to access the CCTV system will be trained to comply with this policy. Staff will understand that all information relating to the CCTV images must be handled securely.

Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.

Staff misuse of surveillance system information will lead to disciplinary proceedings.

## 12. Responsibilities

The Headteacher (or nominated deputy) will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Rosehill Junior School
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Rosehill Junior School
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at Rosehill Junior School 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 or the release of tapes or any material recorded or stored in the system
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Give consideration to 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



- Co-operate with the Health & Safety Officer of Rosehill Junior School in reporting on the CCTV system in operation in the school
- 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 recorded on tapes/DVDs/digital recordings are stored for a period not longer than 25 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, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy
- 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
- Ensure that the DPO does an annual review of the CCTV system to ensure compliance with data protection laws.

### **13.CCTV Checklist**

The ICO recommends that this is completed by all organisations that have CCTV. This checklist should be published as part of your CCTV Policy.

This CCTV system and the images produced by it are controlled by: Rosehill Junior School, who is responsible for how the system is used under the UK GDPR and Data Protection Act 2018.

We (Rosehill Junior School) have considered the need for using CCTV and have decided it is necessary for the prevention and detection of crime and for protecting the safety of individuals, or the security of premises. We will not use the system for any incompatible purposes and we conduct regular reviews of our use of CCTV to ensure that it is still necessary and proportionate.



<b>Statements</b>	<b>Checked (Date)</b>	<b>Checked by Name</b>	<b>Date of Next Review</b>
<i>If our system is processing footage of identifiable individuals and is processing personal data, we have registered as a controller and submitted a relevant data protection fee to the Information Commissioner's Office (ICO). We have also recorded the next renewal date.</i>	24.11.25	Jessica Rayfield	24.11.26
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<i>There is a named individual who is responsible for the operation of the system.</i>	24.11.25	Jessica Rayfield	24.11.26
<i>Prior to processing we have clearly defined the problem we are trying to address. We regularly review our decision to use a surveillance system.</i>	24.11.25	Jessica Rayfield	24.11.26
<i>We have identified and documented an appropriate lawful basis for using the system, taking into consideration Article(s) 6, 9 and 10 of the UK GDPR and relevant Schedules of the DPA 2018.</i>	24.11.25	Jessica Rayfield	24.11.26
<i>Our system produces clear images which we can easily disclose to authorised third parties. For example, when law enforcement bodies (usually the police) require access to investigate a crime.</i>	24.11.25	Jessica Rayfield	24.11.26
<i>We have positioned cameras in a way to avoid any unintentional capture of private land or individuals not visiting the premises.</i>	24.11.25	Jessica Rayfield	24.11.26
<i>There are visible signs showing that CCTV is in operation. Contact details are displayed on the sign(s) if it is not obvious who is responsible for the system.</i>	24.11.25	Jessica Rayfield	24.11.26
<i>We securely store images from this system for a defined period and only a limited number of authorised individuals may have access to them.</i>	24.11.25	Jessica Rayfield	24.11.26
<i>Our organisation knows how to respond to individuals making requests for copies of their own images, or for images to be erased or restricted. If unsure the controller knows to seek advice and <a href="#">guidance</a> from the Information Commissioner's Office (ICO) as soon as a request is made.</i>	24.11.25	Jessica Rayfield	24.11.26



## 14. Monitoring & Review

The effectiveness of this policy will be monitored continually by the headteacher and the governing board. Any necessary amendments may be made immediately.

Date policy last reviewed:

### **Signed by:**

Headteacher: \_\_\_\_\_ Date: \_\_\_\_\_

Chair of Governors: \_\_\_\_\_ Date: \_\_\_\_\_





## Appendix 2 – Data Privacy Impact Assessment Template

### Rosehill Junior School

<b>Name Of Platform</b>
CCTV System - Hikvision 8 Channel DVR
<b>Where is the Company Based?</b>
Rosehill Junior School, Kilnhurst Road, Rawmarsh, Rotherham, S62 5QH
<b>Describe the Platform</b>
<p>Hikvision 8 Channel DVR. 25 days recording serving 8 cameras.</p> <p>Cameras:</p> <ol style="list-style-type: none"> <li>1. Outside front reception door looking towards intercom gate &amp; sports hall door.</li> <li>2. Above bin area looking towards intercom gate &amp; yard area. It also covers the other door to the sports hall.</li> <li>3. On wall outside Year 6 classroom looking towards gazebo &amp; covering yard area.</li> <li>4. On wall outside Year 6 looking towards container &amp; covering walkway and covering entry &amp; exit door for Year 6.</li> <li>5. On wall outside Year 4 pointing back towards camera 4 and covering Year 3 entry and exit door.</li> <li>6. On wall outside door to make hall which covers playground.</li> <li>7. Above Year 4 classroom outside, covering the door with the ramp and car park.</li> <li>8. Above disable door inside near reception which covers reception desk/main door. Also covers Year 6 corridor down to door (where we had two previous break ins).</li> </ol>
<b>What will the school achieve by using the platform?</b>
<p>CCTV consistently delivers benefits in terms of improved health and safety and security within schools. It complements other security measures which are in place within the school.</p> <p>CCTV aims to achieve the following:</p> <ul style="list-style-type: none"> <li>▪ Improve the health and safety and security of pupils, staff, and visitors</li> <li>▪ Protect the school buildings and internal infrastructure</li> <li>▪ Improve pupil behavior</li> <li>▪ Reduce vandalism</li> <li>▪ Provide assistance in the detection and prevention of crime</li> </ul> <p>Parents have the assurance that their children are safe whilst in school. Parents are aware that with CCTV there is the potential for behavior at school to improve. The Board of Governors are also of the opinion that this is the case.</p> <p>Legal Process for Use:</p> <ul style="list-style-type: none"> <li>▪ Article 6 and Article 9 (Special Category Data) under Data Protection Law</li> <li>▪ The Common Law Duty of Care</li> <li>▪ Health and Safety at Work Act</li> <li>▪ Safeguarding Vulnerable Groups Act</li> <li>▪ Working together to Safeguard Children Guidelines (DfE)</li> </ul>



### ***How will it benefit the school?***

*It will enable the headteacher to monitor pupil and parent behaviour on the school site. It will also support the school with additional deterrence for trespasses and those intending to commit crimes on the school site. In addition, the school can also monitor health and safety around the school site.*

### ***What data will be processed?***

*Recording of images. Storage of images securely. Appropriate data retention applied to the images.*

*Only certain members of staff have access to the CCTV system and there is a password in place to limit access.*

*The CCTV may be picking up special category data including race/ethnic origin and the health of an individual. The CCTV system is operational 24 hours a day, 7 days a week. The CCTV images are obtained within the confines of the school grounds.*

*The retention period for the system is 14 days.*

*The school does inform pupils, staff and visitors that CCTV is in use by installing signs detailing their presence. One is located to the front of the school and one to the rear of the school. The CCTV system is capable of identifying individuals from the system and the images can be used in both criminal and civil court cases. If a Subject Access Request is made data may be downloaded or copied for release to the data subject or a third party (in the case of a Data Protection request). Each request for data must be requested via a signed data release form. In the case of the Police this can be authorized by a person at the rank of Sergeant or above using a WA170 form. Cameras are located in areas where pupils and staff have access. Cameras are not located in areas where privacy is expected. There are no cameras in toilet areas, changing rooms, and there are no cameras aimed at private areas such as residents' houses, etc.*

*The CCTV system is proportionate and justified. It also achieves for the school the following benefits:*

- 1. demonstrates a duty of care to its pupils, staff, and visitors*
- 2. protects the fabric of the school both externally and internally*
- 3. as a consequence of this, budgets can be reduced/deferred to other school projects*
- 4. encourages improvement pupil behavior*
- 5. provides assistance in the detection and prevention of crime*
- 6. to assist in managing the school*



**Who will access the system?**

- Zowie Norris (Acting Headteacher)
- Shaun Smith (Site Supervisor)
- Bridie Turton (School Business Manager – currently on maternity leave)
- Jessica Rayfield (School Business Manager – covering maternity leave)
- Jane Abbott (Designated Safeguarding Lead)
- Chloe Stansfield (Inclusion & Attendance Officer)
- Natalie Lindley (Finance Officer)

**What are the potential risks?**

- Positioning of CCTV cameras at entrance points to the school and the issue of privacy
- Housing of CCTV cameras outside and ingress of water
- Ongoing maintenance of CCTV equipment preventing breakdowns, etc.
- CCTV policies and procedures not in place leading to inconsistencies, etc.
- Appropriate CCTV signage in place which conforms to industry standards
- Training not undertaken by those using CCTV
- Privacy Notice (Pupils); (Workforce)
- Noncompliance when upgrading the school's CCTV system

**How have you assessed the risks?**

The risks have been assessed based on previous break ins so it was deemed necessary for the security of the school site. The internal camera is also a deterrent for abuse towards members of staff when in main reception.

**What is the consultation process?**

Worked with the DPO and consulted with the governors on the use of the system.

Headteacher Signature:

Data Protection Officer: