Policy Information Sheet

Name of Policy:	**CCTV Policy**
Delegated Authority	☐ Trust Board ☒ Nominated Committee – Audit and Risk ☐ CEO ☐ CFO ☐Other _____
Policy review cycle	☐ Annual ☒ 3 years ☐ 4 years ☐Other
Statutory policy	☐ Yes ☒ No
Published online	☐ Statutory ☒ Trust recommended ☐ No

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1.0	Sarah Harrington	N/A	07.10.2026
2.0	Wendy Pattison	Re written due to changes from ICO; Audit and risk approval	06.10.2026

1. PURPOSE

This policy sets out the purpose, use and management of CCTV within Hartlepool Free School and ensures that systems are operated in compliance with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), the Human Rights Act 1998, the Protection of Freedoms Act 2012 and ICO guidance on video surveillance including CCTV. Hartlepool Free School is the Data Controller for CCTV operations. The Data Protection Officer (DPO) can be contacted at Northumberland County Council via Vicki Evans – phone: 07890 052728 email: Vicki.Evans@northumberland.gov.uk

A Data Protection Impact Assessment (DPIA) will be completed and reviewed before any CCTV system is introduced, extended or significantly changed. The lawful basis for processing CCTV images is Article 6(1)(e) Public Task and/or Article 6(1)(f) Legitimate Interests. The aims of CCTV are to promote a safe and secure environment for students, staff and visitors, protect the school's property and assets, support behaviour management strategies, assist in the prevention, investigation and detection of incidents, and ensure that surveillance is proportionate, necessary and respectful of individual privacy.

2. SCOPE

This policy applies to all members of the school community including students, staff, governors, contractors and visitors and covers all CCTV and Dashcam systems operated by Hartlepool Free School both internally and externally.

3. PRINCIPLES

The school recognises that students may have heightened sensitivities around privacy, trust and surveillance due to their SEMH needs. CCTV and Dashcams will therefore only be used where it is necessary and proportionate and will not replace positive relationships and behaviour management. Cameras will not be installed in areas where there is an expectation of privacy such as toilets or changing rooms. Covert monitoring will not be used except in exceptional and lawful circumstances. Clear signage will be displayed so individuals are aware that CCTV is in operation. All use of CCTV will comply with UK GDPR principles including lawfulness, fairness, transparency and data minimisation. Further information regarding CCTV processing is available within the school's CCTV Privacy Notice.

4. OPERATION OF THE SYSTEM

The Principal is responsible for the overall operation of the system and day-to-day management is delegated to Sarah Harrington, System Manager who is authorised to view and export footage. Only the CEO or Principal can authorise the release of the footage. The school's CCTV system consists of fixed digital video cameras with audio recording. Live monitoring is only undertaken by authorised staff where necessary for safety and security purposes. Cameras will be positioned to cover relevant areas only and to avoid intrusion into private or neighbouring spaces. Footage may be recorded continuously but will only be reviewed where necessary. A record will be kept of all access to CCTV footage, including the date and time, the name of the person accessing the footage, the reason for access and the outcome.

5. USE OF IMAGES

Recorded images will only be used for the purposes stated in this policy. Footage may be used

to investigate safeguarding concerns, behavioural incidents, vandalism, theft or trespass. Access to footage is strictly limited to authorised staff. Images may be shared with the police for the investigation of crime, with safeguarding agencies where appropriate, and with legal representatives where required by law. CCTV will not be used for routine staff performance monitoring or appraisal purposes, except where there is a specific concern relating to misconduct, safeguarding or health and safety. All sharing will be proportionate and recorded.

6. DATA STORAGE AND RETENTION

Images will be stored securely on password-protected systems with access restricted to authorised personnel. Footage will normally be retained for 30 days, after which it will be automatically deleted unless required for an ongoing investigation. Where footage is exported, it will be stored securely, retained only for as long as necessary and deleted once no longer required. Further information regarding CCTV processing is available within the school's CCTV Privacy Notice.

7. SUBJECT ACCESS REQUESTS

Individuals have the right to request access to CCTV images of themselves under data protection law. Requests must be made in writing to the Data Protection Officer and must include sufficient information to identify the relevant footage. The school will respond within one calendar month. Where footage includes other individuals, the school will attempt to redact or blur third parties where possible. Requests may be refused where disclosure would identify others without consent and cannot reasonably be redacted, prejudice the prevention or detection of crime, or compromise safeguarding.

8. SAFEGUARDING CONSIDERATIONS

Given the SEMH needs of students, staff will explain the purpose of CCTV in a clear and supportive manner. CCTV footage may be used to support restorative approaches where appropriate but will never be used as a tool for public shaming or humiliation.

9. COVERT MONITORING

Covert monitoring will only be undertaken in exceptional circumstances where there is reasonable suspicion of serious misconduct or criminal activity and will only proceed following consultation with the Data Protection Officer and, where appropriate, legal advisors. Any covert monitoring will be time-limited, proportionate, lawful and fully documented.

10. SIGNAGE

Clear and visible signage will be displayed in all areas where CCTV is in operation. Signage will state that CCTV is in use, the purpose of the system, the name of the Data Controller and contact details for further information.

11. BREACH OF POLICY

Misuse of CCTV systems may result in disciplinary action and may be referred to external

authorities. Where required, breaches may be reported to the Information Commissioner's Office (ICO).

12. COMPLAINTS AND QUERIES

Any complaints, queries or requests relating to CCTV should be directed to Sarah Harrington, Operations and Finance Manager; hfssarah.harrington@hartlepoolfreeschool.org.uk.

13. REVIEW

This policy will be reviewed annually or sooner if required due to changes in legislation, technology or the operational needs of the school.

INCIDENT LOG INDEX

Date (dd/mm/yy)	Time (24Hrs)	Location of Camera	Description	Operator Name	Operator Signature

SITE INCIDENT LOG

Incident Date & Time:		Police Crime Reference:	

Description of Incident:
Described by:
Signed and Dated:

Release of Recording

Release date:	
Format:	
Released to (name and address):	
Signed:	

SUBJECT ACCESS REQUEST FORM

Requested by:

Name:
Representative of & badge number if applicable:
Address including Postcode and telephone number:

Reason for Request

Crime Number (if applicable:

Decision (please circle the appropriate one) **Accepted** **Rejected**

Reason given:

If accepted:

Release of video footage date:	**Released by:**

IMPORTANT: THE PERSON ACCEPTS FULL RESPONSIBILITY FOR THE CARE OF THIS VIDEO FOOTAGE AND ANY ACCESS GIVEN TO A THIRD PARTY.

CCTV Locations indicated by a red marker

Ground Floor



First Floor

