Phoenix Arch School

Kind, Curious, Creative and Collaborative

CCTV Policy

2026–27

School	Phoenix Arch School
Policy owner	Headteacher / Designated Safeguarding Lead
DSL	Falu Mehta
Deputy DSLs	Lennie Sarkis and Luana Oancea
DPO	Patricia Kellett
Approval	Governing Body – September 2026
Review date	October 2027, or sooner if statutory guidance changes

1 Policy statement

Phoenix Arch School uses closed circuit television (CCTV) to help keep pupils, staff and visitors safe and to protect the school premises. This policy explains how the system and its recordings are managed. It applies to everyone whose images may be captured.

The school will comply with the UK GDPR, Data Protection Act 2018, as amended, and relevant privacy requirements. CCTV will be used fairly, lawfully and only where necessary and proportionate. The school's Data Protection Officer (DPO) advises on compliance.

2 Purpose of CCTV

CCTV is used to provide a safe and secure environment; prevent damage to or loss of school property; and assist in preventing and investigating crime and safeguarding or safety incidents. Relevant footage may be considered in investigations in accordance with school procedures and data protection requirements.

CCTV does not replace appropriate supervision and will not be used for routine monitoring of staff performance. The school will document the lawful basis for its use in its privacy notice and data protection records.

3 Camera locations
All CCTV cameras are positioned to ensure coverage of high-risk areas such as the school gates, car park, entrance foyer and side entrance.

Cameras will be clearly visible and positioned to minimise recording of neighbouring properties and areas outside the school. Cameras will not be installed in toilets, changing rooms or intimate care areas. Audio recording will not be used.

Signs will tell pupils, staff and visitors that CCTV is in operation and provide a school contact route. Accessible information will be provided where needed.

Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by the trust to ensure that the proposed installation is compliant with legislation and ICO guidance.

4 Management and access
The Headteacher is responsible for the management of CCTV, supported by the designated premises or IT staff. Only named, authorised and trained staff may view or export recordings for a legitimate school purpose. Access will be reviewed regularly and removed when no longer needed.

Live and recorded images must be viewed privately. Recordings and equipment will be protected by appropriate physical security, passwords and access controls. Staff must not copy footage to personal devices or share it through personal email or messaging accounts.

A record will be kept of access, copies and disclosures, including who accessed the footage, when, why and what action was taken. Equipment will be checked regularly to ensure it works correctly.

5 Storage and retention
The proposed routine retention period is up to 28 days, after which footage will be securely deleted or overwritten. This period must be checked against the school's actual system settings and confirmed before approval.

Relevant footage may be kept longer where needed for an incident, safeguarding concern, complaint, access request or investigation. The reason and review date will be recorded. Preserved footage will be held securely and deleted when it is no longer needed under the school's retention requirements.

6 Requests to access recordings
Individuals can ask for access to CCTV images of themselves by contacting the school office or DPO. Requests will be passed promptly to the person responsible for data protection, and relevant footage will be preserved while the request is considered.

The school will verify identity where necessary and normally respond within one month, subject to lawful extensions or other applicable rules. Requests are normally free of charge. The privacy of other

people will be considered, including whether images need to be blurred or redacted. The presence of another person does not automatically prevent disclosure.

Parents requesting footage on behalf of a child must have appropriate authority. The school will consider the child's rights and best interests. Any refusal or restriction will be explained in accordance with data protection law.

7 Sharing recordings

Recordings will only be shared where necessary and lawful, for example with the police, children's social care, the LADO or an authorised investigator. The school will check requests, consult the DPO where appropriate and record the reason for disclosure and the recipient. Copies will be transferred securely.

Where footage is relevant to a disciplinary investigation, the school will follow its disciplinary procedure and ensure the employee has a fair opportunity to respond to the evidence, with appropriate protection for pupils and other individuals.

Footage supplied by a member of the public is separate from the school's CCTV recordings. Any copy received by the school will be stored securely and handled in accordance with safeguarding and data protection requirements.

8 Privacy and changes to the system

The school will assess privacy risks before installing or significantly changing CCTV. A data protection impact assessment will be completed where required, with DPO advice. The particular needs and privacy of pupils will be considered. Staff and relevant representatives will be informed and consulted as appropriate.

9 Misuse and complaints

Any suspected unauthorised access, loss or sharing of footage must be reported immediately to the Headteacher and DPO. The school will follow its data breach procedure and make any required notifications.

Misuse of CCTV may lead to action under the school's disciplinary procedures. Concerns about CCTV should be raised with the Headteacher or DPO; concerns involving the Headteacher should be referred to the Chair of Governors. Individuals may also complain to the Information Commissioner's Office.

10 Review and contact details

The governing body will review this policy annually or sooner if the system, guidance or legal requirements change.

School contact: Phoenix Arch School office — 02084516961

Data Protection Officer: Patricia Kellett