ILP CCTV Policy and Procedure

Reviewed by Risk, Audit, Business & Finance Committee	Approved on 12.10.2026
Approved by Trust Board:	Ratified on 12.10.2026
Policy Owner:	Director of Safeguarding and School Operations (Trust DSL)
Policy Reviewed by:	Executive Team
Version:	4
Next Review:	December 2027
Review Frequency:	Annually
Consultation with JCC:	No
Location of policy:	Staff SharePoint/ Trust Website

1. POLICY STATEMENT

Inspire Learning Partnership uses Close Circuit Television ("CCTV") at several of its School's. The purpose of this policy is to set out the position of Inspire Learning Partnership as to the management, operation and use of the CCTV within Inspire Learning Partnership.

This policy applies to all members of staff across Inspire Learning Partnership, visitors to our individual premises and all other persons whose images may be captured by the CCTV system.

This policy takes account of all applicable legislation and guidance, including:

- UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018
- the Data Protection Act 2018 (together the 'Data Protection Legislation')
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998

The Trust processes CCTV data under Article 6(1)(e) UK GDPR, performance of a task carried out in the public interest, and/or Article 6(1)(f), legitimate interests, where applicable.

This policy and procedure set out the position of Inspire Learning Partnership in relation to its use of CCTV.

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This policy should be read in conjunction with:

- Data Protection Policy
- Data Retention Policy
- Child Protection and Safeguarding Policy
- Staff Code of Conduct
- Disciplinary Policy
- Health and Safety Policy

2. PURPOSE OF CCTV

Inspire Learning Partnership uses CCTV for the following purposes:

- to provide a safe and secure environment for students, members of staff and visitors;
- to prevent the loss of or damage to Inspire Learning Partnership buildings and/or assets; and
- to assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.
- monitoring safety of outdoor play areas and external grounds

3. DESCRIPTION OF SYSTEM

The following Schools operate a CCTV system with a range of cameras which cover the schools grounds. All of these cameras are in fixed locations. Audio recording will only be enabled where a specific and documented justification exists and its use can be demonstrated as necessary and proportionate.

- Blackfield Primary School
- Hightown Primary School
- St Monica Primary School
- Endeavour Primary School

Further information about where the CCTV cameras are positioned can be obtained on request.

4. SITING OF CAMERAS

All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.

Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. Inspire Learning Partnership will make all reasonable efforts to ensure that areas outside of Inspire Learning Partnership premises are not recorded.

Signs will be erected to inform individuals that they are in an area within which CCTV is in operation, as required by the Code of Practice of the Information Commissioner.

Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.

5. Data Protection Impact Assessment (DPIA)ASSESSMENT

Prior to the installation of any new CCTV camera, or system, a Data Protection Impact Assessment (DPIA)will be conducted by Inspire Learning Partnership to ensure that the proposed installation is compliant with legislation and ICO guidance. DPIAs will be reviewed periodically and whenever significant changes are made to CCTV systems.

Inspire Learning Partnership will adopt a privacy by design approach when installing new cameras and systems, considering the purpose of each camera as to avoid recording and storing excessive amounts of personal data.

6. MANAGEMENT AND ACCESS

On a day to day basis the CCTV will be operated by members of staff in School's with delegated authority as appropriate.

The viewing of CCTV images will be restricted to members of staff in School's (or Education Support Team) with explicit powers to view images, for the reasons set out above.

Recorded images which are stored by the CCTV system will be restricted to access by members of staff within the School's with explicit powers to view images, for the reasons set out above.

No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy and procedure as to disclosure of images.

The CCTV systems should be checked weekly by the appropriate members of staff in School's to ensure that it is operating effectively.

CCTV systems will be maintained securely and protected against unauthorised access through appropriate technical and organisational measures.

7. STORAGE AND RETENTION OF IMAGES

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

CCTV is not routinely used for monitoring employee performance or conduct. CCTV footage may however be reviewed where there is reason to investigate misconduct, criminal activity, safeguarding concerns or serious breaches of Trust policies.

CCTV footage will normally be retained for a maximum of 30 days unless required for an ongoing investigation, safeguarding matter, insurance claim, disciplinary process or legal proceedings.

CCTV may be used to support the investigation of safeguarding concerns, incidents involving pupils and allegations requiring safeguarding review.

Inspire Learning Partnership will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place will include:

- CCTV recording systems being in restricted access areas;
- the CCTV system being encrypted/password protected; and
- restriction of the ability to make copies to specified members of staff.

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, should be maintained within each School.

8. DISCLOSURE OF IMAGES TO DATA SUBJECTS

Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation and has a right to request access to those images.

Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of Inspire Learning Partnership's Data Protection Policy. Requests will normally be responded to within one month in accordance with UK GDPR.

When such a request is made the appropriately nominated representative will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

If the footage contains only the individual making the request, then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The nominated representative must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals, then Inspire Learning Partnership will consider whether:

- the request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
- the other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or

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- if not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

A record must be kept, and held securely, of all disclosures which sets out:

- when the request was made;
- the process followed by the nominated person in determining whether the images contained third parties;
- the considerations as to whether to allow access to those images;
- the individuals that were permitted to view the images and when; and
- whether a copy of the images was provided, and if so to whom, when and in what format.

9. DISCLOSURE OF IMAGES TO THIRD PARTIES

Inspire Learning Partnership will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

Requests for CCTV footage made under the Freedom of Information Act will be considered in accordance with applicable legislation. Personal data contained within CCTV footage will normally be exempt from disclosure.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

If a request is received from a law enforcement agency for disclosure of CCTV images the nominated person must follow the same process as above in relation to subject access requests. Requests from law enforcement agencies should normally be made in writing and retained with the disclosure log. Details should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third-party images.

The information above must be recorded in relation to any disclosure.

If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However, very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

10. MISUSE OF CCTV SYSTEMS

The misuse of CCTV systems could constitute a criminal offence.

Any member of staff who breaches this policy and procedure may be subject to disciplinary action.

11. Training

All Inspire Learning Partnership employees receive regular GDPR training. Training in the use of the CCTV system will be delivered by the schools Site Manager to relevant stakeholders.

12. Signage

- Signs will identify Inspire Learning Partnership as the data controller and provide contact details or details of how further information may be obtained.
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- Signs need to state that people are being recorded and the reason why they are being recorded.
- Signs need to be appropriate in relation to size and context and should not affect the movement of pedestrian and vehicular traffic.
- Signs need to be checked against what the camera(s) is/are recording to ensure accuracy.

Changes History Table

Version	Date	Amended By	Reviewed By	Approved By	Summary of Changes
4	September 2026	Director of Finance	Executive Team on 22.09.2026	Risk, Audit, Business & Finance Committee Members Approved the policy. Full Board Ratified the Policy.	• **Retention period increased** from **7 days to 30 days**, with footage retained longer where required for safeguarding, disciplinary, legal or insurance purposes. • **Stronger safeguarding focus**, explicitly **recognising** CCTV as a tool to support safeguarding investigations and incidents involving pupils. • **Audio recording controls tightened**, with audio only permitted where there is a documented and proportionate justification. • **Data protection requirements strengthened**, including formal DPIAs, clearer lawful **processing** grounds under UK GDPR, and enhanced system security expectations. • **Updated disclosure procedures** to provide greater clarity around Subject Access Requests, Freedom of Information requests and requests from law enforcement agencies. • **School list updated** to reflect current Trust arrangements, including the addition of **Endeavour** Primary School.

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