



CCTV Privacy Notice: Winton Primary School

1 Introduction

Winton Primary School uses closed-circuit television (CCTV) systems on parts of the school site. This privacy notice explains how and why we use CCTV, what happens to the images recorded, and the rights of individuals whose personal data may be captured.

The school is committed to protecting the safety, welfare and security of pupils, staff, visitors and property, while respecting individuals' privacy rights and complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Winton Primary School is the **data controller** for personal data collected through its CCTV system.

Why the school uses CCTV

The school considers the use of CCTV to be necessary and proportionate in order to maintain a safe, secure and well-managed environment for pupils, staff, visitors and property.

The purposes of CCTV monitoring include:

- Protecting the safety and welfare of pupils, staff and visitors.
- Supporting the school's safeguarding responsibilities.
- Preventing, deterring and detecting crime, vandalism and anti-social behaviour.
- Assisting in the investigation of incidents, accidents, complaints or disciplinary matters.
- Supporting law enforcement agencies where appropriate.
- Protecting school buildings, equipment and other assets.
- Monitoring the security of the school site.

Children's Privacy

The school recognises that many individuals captured by CCTV are children. CCTV is used only where it is necessary and proportionate to achieve legitimate safeguarding, safety and security objectives.

The school regularly reviews its use of CCTV to ensure that it remains justified and does not unnecessarily affect the privacy of pupils, staff or visitors.

Lawful Basis for Processing

The school processes personal data captured by CCTV under **Article 6(1)(e) of the UK GDPR**, which allows processing that is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the school.

Where appropriate, CCTV footage may also be processed to meet the school's legal obligations, safeguarding duties, and responsibilities relating to health and safety and site security.

CCTV Camera Locations

CCTV cameras are positioned at key locations around the school site, including entrances, exits, external areas, playgrounds, car parks and perimeter boundaries.

The school takes reasonable steps to position cameras so that they monitor only areas relevant to the purposes stated above and avoid unnecessary intrusion into neighbouring properties or private areas.

CCTV cameras are **not installed** in areas where individuals would reasonably expect a higher level of privacy, such as:

- Toilets
- Changing facilities
- Medical treatment areas

The School's Responsibilities

The school is registered with the Information Commissioner's Office (ICO) and complies with applicable data protection legislation.

To ensure accountability, the school will:

- Display clear CCTV signage at school entrances and monitored areas.
- Restrict access to CCTV recordings to authorised individuals only.
- Ensure CCTV systems are used solely for legitimate and lawful purposes.
- Keep records of processing activities where required.
- Regularly review the ongoing need for CCTV monitoring.
- Undertake a Data Protection Impact Assessment (DPIA) where the use of CCTV is likely to present a high risk to individuals' rights and freedoms.

Where CCTV footage identifies criminal activity, safeguarding concerns or serious breaches of school policies, the school will take appropriate action in accordance with its procedures and legal obligations.

Storage and Retention of CCTV Footage

CCTV recordings are stored securely and access is restricted to authorised personnel who require access for legitimate business purposes.

Routine CCTV recordings are normally retained for **30 days**, after which they are automatically deleted.

Recordings may be retained for longer where they are required for:

- Safeguarding investigations
- Disciplinary procedures
- Complaints investigations
- Health and safety investigations
- Legal proceedings
- Insurance claims
- Criminal investigations

Where footage is retained beyond the normal retention period, the reason for retention and the retention period will be documented.

Sharing CCTV Footage

Access to CCTV footage is limited to authorised staff members who have a legitimate reason to view it.

Where necessary and lawful, CCTV footage may be shared with:

- Police forces and other law enforcement agencies
- Local authorities
- Courts, tribunals or legal representatives
- Insurers and insurance investigators
- Regulatory or safeguarding bodies
- Other organisations where disclosure is required by law

The school will only disclose CCTV footage where there is a lawful basis for doing so.

Your Rights

Under the UK GDPR, individuals have a number of rights regarding their personal data. These include the right to:

- Request access to personal data held about them.
- Request rectification of inaccurate personal data.
- Request restriction of processing in certain circumstances.
- Request erasure in specific circumstances.
- Object to processing where applicable.
- Lodge a complaint with the Information Commissioner's Office (ICO).

Please note that these rights are not absolute and may be limited where the school has a lawful basis for continuing to process the information.

Requesting access to CCTV Footage

Individuals may request access to CCTV footage in which they appear by submitting a Subject Access Request.

Where footage contains images of other individuals, the school will consider whether disclosure can be made in accordance with data protection legislation and may redact, blur or otherwise restrict access where necessary to protect the rights and freedoms of others.

The school will normally respond to valid requests within one calendar month.

Further information and Complaints

If you have any questions about this privacy notice or the school's use of CCTV, please contact:

Data Protection Lead

Simon Churchill, Business Manager

Email: office@wintonprimary.uk

Data Protection Officer

Handsam Limited

Email: infor@handsam.co.uk

If you remain dissatisfied after raising your concerns with the school, you have the right to complain to the Information Commissioner's Office (ICO).

Information Commissioner's Office

Website: <https://ico.org.uk/concerns>

Telephone: 0303 123 1113