



CCTV Policy

Academic Year 2025-2026

I. PURPOSE

St Paul's Cathedral School (SPCS) uses CCTV cameras to view and record pupils, parents, staff and visitors on and around our premises. We recognise that the images of individuals recorded by CCTV cameras are personal data which must be processed in accordance with data protection laws.

The purpose of this policy is to:

- outline why and how we will use CCTV, and how we will process personal data recorded by CCTV cameras;
- ensure that the legal rights of our pupils, parents, staff and visitors relating to their personal data are recognised and respected; and
- assist staff in complying with relevant legal obligations when working with personal data.

A breach of this policy may, in appropriate circumstances, be treated as a disciplinary matter. Following investigation, a breach of this policy may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

The CCTV system is administered and managed by the SPCS, which is the controller in respect of personal data collected by our CCTV cameras. If you have any questions about this policy, please contact The Bursar.

This policy will be subject to periodic review, and should be read with reference to the School's Data Protection Policy and Privacy Notice. We will also review the ongoing use of existing CCTV cameras regularly to ensure that their use remains necessary and appropriate, and that the system is continuing to address the needs that justified its introduction.

2. Objectives

SPCS purposes for using the CCTV system are set out below and, having fully considered the privacy rights of individuals, SPCS believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

- To protect pupils, parents, staff and visitors with regard to their personal safety and to act as a deterrent against crime.
- To protect SPCS buildings and equipment, and the personal property of pupils, parents, staff and visitors from damage, disruption, vandalism and other crime.
- To prevent and detect crime, and support law enforcement bodies in the prevention, detection and prosecution of crime as well as the identification and apprehension of offenders.
- To monitor the security and integrity of SPCS site, deliveries, and arrivals.
- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the School's rules, which are available to parents and pupils on request.
- To assist in day-to-day management, including ensuring the health and safety of pupils, parents, staff and visitors.
- To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
- To assist in civil litigation, including employment tribunal proceedings.

Please note that this list is not exhaustive and other purposes may become relevant from time to time.

3. Positioning

Locations for the CCTV cameras have been selected, both inside and outside our premises, that the School reasonably believes require monitoring to address the above objectives. Cameras are located at:

- The school pedestrian and vehicle entrance gates.
- Main entrance to reception
- School Playgrounds
- Entrance to boarding accommodation (from September 2025)

Adequate signage has been placed in prominent positions around the premises to inform pupils, parents, staff and visitors that they are entering a monitored area, identifying SPCS as the controller operating the CCTV system and including contact details for further information regarding the CCTV system.

Camera locations have been chosen to minimise viewing of spaces not relevant to the legitimate purposes of SPCS monitoring. As far as practically possible, CCTV cameras will not focus on private property; and no images of public spaces will be captured except to a limited extent at site entrances. In addition, surveillance systems will not be used to record sound, and no images will be captured from areas in which individuals would have a heightened expectation of privacy, including medical, changing and washroom facilities.

4. Maintenance

The CCTV system will be operational 24 hours a day and every day of the year.

Authorised personnel will check and confirm that the CCTV system is properly recording and that cameras are functioning correctly, on a regular basis.

The CCTV system will be checked and serviced no less than annually by Minerva Fire and Security.

5. Supervision

We will ensure that recorded images are only viewed by approved members of staff whose roles require them to have access to such data. The following members of staff have access to the CCTV online app:

- Head
- Bursar
- DSL
- Head of Boarding
- Site Manager
- IT Manager

During the course of their duties, other members of the SPCS or the Cathedral Security Team may be given express permission to view the CCTV images by the Head or Bursar.

Access to the CCTV online app is via www.eagleeyenetworks.com. Every access to the system must be logged in the CCTV Log (held by the Bursar). A blank electronic page is held at Y:\CCTV which must be completed with a clear reason for accessing the system (even a test) and the page passed to the bursar for filing in the log.

Staff using the CCTV system will be given appropriate training to ensure that they understand and observe the legal requirements related to the processing of relevant data.

Images will only be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

6. Storage

To ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered by CCTV cameras is stored in a way that maintains its integrity and security. Given the large amount of data generated by the CCTV system, we may store video footage using a cloud computing system. We will take all reasonable steps to ensure that any cloud service provider maintains the security of our information, in accordance with industry standards. We may also engage data processors to process data on our behalf. We will ensure appropriate contractual safeguards are in place to protect the security and integrity of the data.

Images will be stored for 31 days, and permanently automatically over-written unless SPCS considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required to retain such data (for example, by an appropriate third party such as the police or local authority).

Where personal data collected by the CCTV system is retained, it will be held in accordance with data protection law and our Data Protection Policy.

7. Requests for disclosure

Individuals have the right to request access to personal data that SPCS holds about them, “subject access request”, on which, please see the School’s Privacy Notice and Data Protection Policy for further information, including information collected by the CCTV system, if it has been retained.

In order to respond to a subject access request, SPCS will require specific details including (as a minimum) the time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

SPCS must also be satisfied as to the identity of the person wishing to view stored images and the legitimacy of their request.

No images from our CCTV cameras will be disclosed to a third party without express permission being given by SPCS. The following are examples of circumstances in which SPCS may authorise disclosure of CCTV images to third parties:

- Where required to do so by the police or any relevant local or statutory authority;
- To make a report regarding suspected criminal behaviour or a safeguarding incident;
- To enable the Designated Safeguarding Lead or their appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- To assist SPCS in establishing facts in cases of unacceptable pupil behaviour, in which case, the pupil’s parents/guardian will be informed as part of the School’s management of a particular incident;
- To individual data subjects (or their legal representatives) pursuant to a subject access request (as outlined above);

- To the School's insurance company where required in order to pursue a claim (for example for damage to insured property); or
- In any other circumstances required under law or regulation.

Where images are disclosed, a record will be made in the system logbook including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).

The School reserves the right to obscure images of third parties when disclosing CCTV footage, where we consider it necessary to do so.

8. Complaints and queries

Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to Bursar.

For any other queries concerning the use of your personal data by SPCS, please see the School's applicable Privacy Notice.

CCTV FOOTAGE ACCESS REQUEST

The following information is required before SPCS can provide copies of or access to CCTV footage from which a person believes they may be identified.

Please note that CCTV footage may contain the information of others that needs to be protected, and that the school typically deletes CCTV recordings after a 31-day period.

Name and address: (proof of ID may be required)	
Description of footage (including a description of yourself, clothing, activity etc.)	
Location of camera	
Date of footage sought	
Approximate time (give a range if necessary)	

Signature*.....

Print Name.....

Date

*** NB**

if requesting CCTV footage of a child of preparatory school age, a person with parental responsibility should sign this form.