**CCTV Usage Policy**

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| Approved By: | Governing Body/Headteacher |
| Date: | June 2025 |
| Review Date: | June 2028 |
| Version | 1.0 |
| Signed: |  |

**1. Introduction**

1.1. Victoria Road School in conjunction with the Department of Education, Sports and Culture (“the School”) has installed a CCTV system to monitor and record the premises to maintain a safe and secure environment for pupils, staff, and visitors.

1.2. Images recorded are personal data and processed in accordance with the Data Protection Legislation.

1.3. This Policy outlines:

* The purposes for using CCTV;
* Camera locations;
* Use and management guidelines; and
* Contact information for queries or data access requests.

**2. Responsible Parties**

2.1. The Department of Education, Sport and Culture (DESC) is the Data Controller (Registration No: R001501).
2.2. The Headteacher is responsible for the day-to-day operation of the CCTV system and this Policy.
2.3. For queries, please contact the Headteacher via the school office.
2.4. This Policy is reviewed regularly, particularly after any significant changes to the system.

2.5. The viewing of CCTV images is restricted to nominated staff, agreed by the Headteacher.

**3. Purpose of CCTV**

The CCTV system has been installed to:

* Promote the safety and security of pupils, staff, visitors, and school property.
* Deter, prevent and support the investigation of criminal activity such as vandalism or trespass.
* Assist in the investigation of complaints, accidents, or incidents.

**Privacy by Design**

* Cameras are installed externally only and positioned to be justified, necessary, and minimally intrusive. The system is configured so that private areas such as neighbouring residential properties or non-school premises are not visible or recorded. Where the camera view could include such areas, they are digitally masked or blurred in the system, ensuring they always remain unviewable and unrecorded.
* No cameras are positioned internally, and care has been taken to ensure that the system supports the principles of proportionality and necessity.

**4. DPIA Linkage and Review**

4.1. A Data Protection Impact Assessment (DPIA) was conducted and approved by the DESC DPO.
4.2. Any changes to system use, location, or purpose will trigger a DPIA review.
4.3. The DPIA confirms processing is:

* Lawful under Article 6(1)(e) – public task;
* Necessary and proportionate;
* Not in breach of Article 8 of the Human Rights Act.

**5. Camera Locations**

5.1. Cameras are installed exclusively in external areas and cover the following:

* Main entrances and exits
* External building perimeters

5.2. Cameras do not monitor any internal area.

5.3. Camera angles are deliberately configured to avoid capturing public spaces or neighbouring private property. Where the view includes such areas, digital masking is applied to ensure these locations are blurred out and not recorded in line with privacy by design principles.

5.4. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.

**6. System Operation**

6.1. The system records continuously 24/7.
6.2. Recordings are retained for 30 days and automatically overwritten unless:

* Required by law enforcement
* Necessary for a school investigation (then retained securely until no longer needed)

6.3. Audio recording and facial recognition are not used.
6.4. The DVR is:

* Located in a secure, access-restricted room
* Protected by passwords and encryption where supported

6.5. Signage is displayed at all school entry points and camera areas in line with ICO guidance.

**7. Access and Disclosure**

7.1. **Subject Access Requests (SARs):**

* Recorded images which are stored by the CCTV system will be restricted to access by the Headteacher and if a Subject Access Request has been received, by the Department of Education, Sport and Culture’s Data Protection Officer, as appropriate.
* No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.

7.2. **Third-party Requests (e.g. Police):**

* The School will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.
* Requests are assessed case-by-case and approved only when a lawful basis exists.
* 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.

**8. Training and Oversight**

8.1. Only staff authorised by the Headteacher may operate the system.
8.2. All authorised users receive training on:

* Legal requirements and privacy principles
* Technical system operation
* Handling data access and disclosure properly

8.3. Refresher training is delivered when significant changes are made to the system.

**9. Retention and Accuracy**

9.1. CCTV footage is stored for **30 days**, unless required longer for legal reasons.
9.2. The system’s time/date settings are synchronised automatically to ensure accuracy.
9.3. Maintenance checks are conducted regularly to ensure proper function and alignment.

**10. Complaints**

10.1. Complaints should be raised via the school.

10.2. If unresolved, individuals may contact the Isle of Man Information Commissioner:
**Prospect House, Douglas, IM1 1ET**
**Tel**: +44 1624 693260
**Email**: ask@inforights.im
**Web**: [www.inforights.im](https://www.inforights.im)