St Cyprian's Greek Orthodox Primary Academy

ΠΑΝΤΑ ΙΣΧΥΩ ΕΝ ΤΩ ΕΝΔΥΝΑΜΟΥΝΤΙ ΜΕ ΧΡΙΣΤΩ ΙΝΑ ΑΡΙΣΤΕΥΩ

I AM STRONG THROUGH JESUS CHRIST

TO THE BEST THAT I CAN BE

CCTV Policy

Revised: July 2026

Reviewed and ratified by Full academy Trust:

Date: 16.7.26

Signed: A. Christou.

Name: AREDI CHRISTOU

Position: Chair of Academy Trust

Date of next review: July 2027

Our Mission Statement:
The aim of St Cyprian's Greek Orthodox Primary Academy is to provide its children with primary education of the highest quality in a supportive learning environment through the National Curriculum in the core subjects, enriched by the progressive teaching of the Greek language and Christian Orthodox religion.

The children will be equipped with the knowledge, skills and spirituality to enable them to achieve their full potential and prepare them for transition to secondary education and to contribute positively to the challenges of a diverse multicultural society.

The term 'parents' in this policy also refers to carers.

The Policy
St Cyprian's Greek Orthodox Primary Academy uses closed circuit television (CCTV) to monitor the Academy buildings and grounds in order to help provide a safe and secure environment for its pupils, staff and visitors and to help prevent loss or damage to Academy property.

- The Academy recognises that recording images of identifiable individuals is a form of processing personal information, which must comply with data protection law.

- The purpose of this policy is to describe the use of CCTV systems at the Academy and ensure that:
  - Our use of CCTV and the way that we process and store images is compliant with data protection legislation.
  - The images captured are appropriate, and only processed for specific purposes.

- This policy covers the use of CCTV systems, which capture moving and still images of people who could be identified, and information relating to individuals for any of the following purposes:
  - Observing what an individual is doing
  - Using images of individuals that could affect their privacy

- The CCTV system is designed to take into account its effect on individuals, their privacy and personal data and the use of CCTV in the Academy is minimised.

- CCTV cameras are only located in public spaces where it is necessary to fulfil their intended purpose. No cameras are located in private places such as washrooms and changing areas and the Academy does not make use of hidden CCTV cameras.

- Warning signs have been placed throughout the premises where the CCTV system is active. The Academy notifies all pupils, staff and visitors of the purpose for collecting CCTV data via notice boards.

- The Academy may use the system to review the conduct of individuals in response to a reported incident where deemed appropriate by the Head Teacher. Images captured by the system may also be shared for the purposes of law enforcement where necessary.

- The CCTV system is owned by the Academy and images from the system are strictly controlled and accessible by authorised personnel only and is password protected.

- The Academy authorises access to the CCTV system to the following personnel:
  - Head Teacher
  - ICT Contractor (who supplies and maintains the system)
  - Data protection officer (DPO)
  - Site manager
  - School Business Manager

- The Head Teacher is responsible for ensuring the integrity and security of the system and that the system is only used in accordance with this policy. The Academy appointed Data Protection Officer (DPO) will support the Head Teacher to ensure effective implementation of this policy.

- All CCTV footage will be stored securely and kept for only as long as necessary according to the Academy's Data Retention Policy which can be obtained from the school office.
- The CCTV system will be maintained in order to ensure its accuracy and reliability.
- The CCTV system will be registered with the ICO in line with data protection legislation.
- The CCTV equipment is kept physically secure in a locked cabinet.
- Visual display monitors are located in the main Academy office.
- The Academy recognises the right of an individual about whom the Academy processes personal data to request access to view the information (CCTV images) that we hold about them. For information on how to request access to data please refer to the Academy's Data Protection Policy.
- Releasing the recorded images to third parties will be permitted only in the following limited and prescribed circumstances, and to the extent required or permitted by law:
    - The police – where the images recorded would assist in a specific criminal inquiry
    - Prosecution agencies – such as the Crown Prosecution Service (CPS)
    - Relevant legal representatives – such as lawyers and barristers
    - Persons who have been recorded and whose images have been retained where disclosure is required by virtue of data protection legislation and the Freedom of Information Act 2000
- Requests for access or disclosure by third parties will be recorded and the Head Teacher will make the final decision as to whether recorded images may be released to persons other than the police.
- All data containing images captured by the CCTV belongs to, and remains the property of the Academy.
- This policy will be reviewed at least once per year by the Academy Trust.
  This policy is a working document and can be updated to reflect changes in the working practices of the Academy at any time. Please ensure that you access the most recent version of this document either by downloading the current version the website or by contacting the Academy office.
- The Head Teacher will be responsible for monitoring any changes to legislation that may affect this policy, and make the appropriate changes accordingly.
- The Head Teacher will communicate changes to this policy to all members of staff and other relevant persons as appropriate.

Appendix 1

Legal framework

- This policy has due regard to legislation including, but not limited to, the following:
  - The Regulation of Investigatory Powers Act 2000
  - The Protection of Freedoms Act 2012
  - The General Data Protection Regulation
  - The Freedom of Information Act 2000
  - The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
  - The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
  - The Academy Standards and Framework Act 1998
  - The Children Act 1989
  - The Children Act 2004
  - The Equality Act 2010
- This policy has been created with regard to the following statutory and non-statutory guidance:
  - Home Office (2013) 'The Surveillance Camera Code of Practice'
  - ICO (2017) 'Overview of the General Data Protection Regulation (GDPR)'
  - ICO (2017) 'Preparing for the General Data Protection Regulation (GDPR) 12 steps to take now'
  - ICO (2017) 'In the picture: A data protection code of practice for surveillance cameras and personal information'
- This policy operates in conjunction with the following Academy policies:
  - Photography and Videos at Academy Policy
  - Freedom of Information Policy
  - GDPR Data Protection Policy