



CCTV Policy

1. Policy Statement

- 1.1. For the purpose of this policy 'The School' is defined as Henry Bloom Noble School.
- 1.2. The School uses Close Circuit Television ("CCTV") within the premises of the School. The purpose of this policy is to set out the position of the school as to the management, operation and use of the CCTV at the school.
- 1.3. This policy applies to all members of our Workforce, visitors to the School premises and all other persons whose images may be captured by the CCTV system.
- 1.4. This policy takes account of all applicable legislation and guidance, including:
 - 1.4.1.1. General Data Protection Regulation ("GDPR")
 - 1.4.1.2. Data Protection Act 2018 (together the Data Protection Legislation)
 - 1.4.1.3. CCTV Code of Practice produced by the Information Commissioner
 - 1.4.1.4. Human Rights Act 2001.
- 1.5. This policy sets out the position of the s in relation to its use of CCTV.

2. Purpose of CCTV

- 2.1. The School uses CCTV for the following purposes.
 - 2.1.1. To provide a safe and secure environment for pupils, staff and visitors
 - 2.1.2. To prevent the loss of or damage to the School buildings and/or assets.
 - 2.1.3. To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.

3. Description of system

- 3.1. Local monitor with 16 cameras.

4. Siting of cameras

- 4.1. 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.

- 4.2. 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. The School will make all reasonable efforts to ensure that areas outside of the School premises are not recorded.
- 4.3. Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.
- 4.4. Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.
- 4.5. Cameras will not be sited in classrooms.

5. Privacy Impact Assessment

- 5.1. Prior to the installation of any new CCTV camera, or system, a privacy impact assessment will be conducted by the School to ensure that the proposed installation is compliant with legislation and relevant guidance from the Information Commissioner.
- 5.2. The School will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

6. Management and access

- 6.1. The CCTV system will be managed by the Headteacher
- 6.2. On a day to day basis the CCTV system will be operated by the Site Manager.
- 6.3. The viewing of live CCTV images will be restricted to the Headteacher, Deputy headteacher and site manager.
- 6.4. Recorded images which are stored by the CCTV system will be restricted to access by the Headteacher, Deputy headteacher and site manager and, if a Subject Access Request has been received, by the Department of Education, Sport and Culture's Data Protection Officer, as appropriate. Other school staff will only be given access if needed to identify individuals and only under supervision of the head or deputy.
- 6.5. 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.
- 6.6. The CCTV system is checked Monthly by the site manager to ensure that it is operating effectively

7. Storage and retention of images

- 7.1. 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.

- 7.2. Recorded images are stored only for a period of 6 weeks unless there is a specific purpose for which they are retained for a longer period.
- 7.3. The School will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:
 - 7.3.1. CCTV recording systems being located in restricted access areas;
 - 7.3.2. The CCTV system being encrypted/password protected;
 - 7.3.3. Restriction of the ability to make copies to specified members of staff
 - 7.3.4. Digital Video recorders not being permanently connected to the internet (– connection will only be to ensure that firmware fixes are put in place).
- 7.4. A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by the School.

8. Disclosure of images to data subjects

- 8.1. 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.
- 8.2. 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 the Department of Education, Sport and Cultures Subject Access Request Procedure which can be found online at <https://www.gov.im/media/1363107/subject-access-request-procedure-desc.pdf>.
- 8.3. When such a request is made the Headteacher will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.
- 8.4. 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 Headteacher must take appropriate measures to ensure that the footage is restricted in this way.
- 8.5. If the footage contains images of other individuals then the School must consider whether:
 - 8.5.1. 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
 - 8.5.2. the other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained

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

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

8.6.1. when the request was made

8.6.2. the process followed by the Headteacher in determining whether the images contained third parties

8.6.3. the considerations as to whether to allow access to those images

8.6.4. the individuals that were permitted to view the images and when

8.6.5. 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

9.1. 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.

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

9.3. If a request is received from a law enforcement agency for disclosure of CCTV images then the Headteacher must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular 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.

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

9.5. 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. Review of policy and CCTV system

10.1. This policy will be reviewed Annually

11. The CCTV system and the privacy impact assessment relating to it will be reviewed Annually

12. Misuse of CCTV systems

12.1. The misuse of CCTV system could constitute a criminal offence.

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

13. Complaints relating to this policy

If an individual believes that the school has not complied with this Policy or the Data Protection legislation, they should utilise the School complaints procedure or contact the Isle of Man Information Commissioner.

Further advice and information is available from:

Isle of Man Information Commissioner,
P.O. Box 69,
Douglas,
Isle of Man,
IM99 1EQ
Telephone: +44 1624 693260
Email: ask@inforights.im

14. For further information about this policy please contact:

Henry Bloom Noble Primary School

Westmoreland Rd,

Douglas,

Isle of Man,

IMI 4AQ

e-mail: HBNEnquiries@sch.im

Written and agreed: July 2025

Next Review: July 2026