THE MOUNTBATTEN SCHOOL

Privacy Notice for CCTV

The Mountbatten School is the 'Data Controller' for the personal information we process. We use Closed Circuit Television (CCTV) within the school premises and are committed to protecting the privacy of our workforce, students, and visitors in accordance with the UK GDPR and the Data Protection Act 2018.

Our data protection officer can be contacted via dpo@mountbatten.school

The Personal Data we hold

We operate a system comprising internal and external day and night cameras. The personal data captured includes:

- Images and video footage of individuals on the school site.
- The does not use sound recording capability, except in exceptional circumstances.

Why we use CCTV Data

The school determines the deployment of CCTV to:

- Provide a safe and secure environment for students, staff, and visitors.
- Protect school buildings and assets.
- Assist in the prevention and reduction of crime.
- Monitor student behaviour and support safeguarding investigations

The lawful basis for Processing

We process CCTV images under the following legal grounds:

- Article 6(1)(e) (Public Task): To perform official school functions and ensure safety.
- Article 6(1)(f) (Legitimate Interests): Specifically for the operation of CCTV for security and crime prevention.
- Article 6(1)(f) – the processing is necessary for the purposes of the legitimate interest of the controller, for the operation of CCTV for security and crime prevention
- Article 9(2)(g) – the processing is necessary for reasons of substantial public interest

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

Storing this data

CCTV footage is stored on a secure central server.

- Access Control: Access is strictly restricted to authorised personnel (IT Services, Site Manager, and Senior Leadership) on a role-based, "need-to-know" basis.
- Technical Security: We maintain security through mandatory Multi-Factor Authentication (MFA) for all administrative and remote access to the CCTV system

Where data is transferred outside the UK/EEA, we ensure adequate protection is in place through standard contractual clauses or other legally recognised safeguards.

Data Retention

In accordance with our 2025 Data Retention Policy, we keep records for the following period:

- Standard CCTV Footage: 31 days
- Footage may be retained longer if identified for a safeguarding concern, legal matter, or criminal investigation.

Disclosure and Sharing

We only disclose CCTV images to third parties when permitted by law, such as:

- Law Enforcement Agencies: To assist in the investigation of a specific crime.
- Disciplinary Procedures: Footage may be used within the school's internal discipline or grievance procedures.

Your Rights:

Any individual recorded has the right to request access to their images.
Making a Request: Requests should be made in writing to the Headteacher or DPO. You must provide sufficient information to identify the footage (e.g., date, time, and specific location).
Response Timeline: We will respond within one calendar month. This may be extended by a further two months for complex cases.

Third-Party Privacy: If footage contains images of others, the school will consider if images can be distorted or if it is reasonable to disclose them without infringing on others' rights.

The school also reserves the right to refuse access to CCTV footage where this would jeopardise an ongoing investigation.

Please note that the school does not currently have the software or resources to redact third-party images; therefore, access may be limited to viewing only or refused if the privacy of others cannot be protected

Rights to Restrict Processing: you have the right to suppress the processing of your personal data. This allows the school to continue holding the data but prevents any further use of it while we consider requests for rectification or objections to processing.

The school does not currently use automated decision-making or profiling (such as facial recognition technology) within its CCTV system.

Complaints and Information Requests

If you have a concern about our use of CCTV, or wish to make a complaint, please contact our Data Protection Officer in the first instance.
Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

For requests regarding non-personal school information, please refer to our Freedom of Information Policy.

Contact

If you would like to discuss anything in this privacy notice, please email for the attention of the Data Protection Officer via dpo@mountbatten.school