



Bishop Wilkinson

Catholic Education Trust
Through Christ, in Partnership

CCTV Policy

Date Approved by Trust	July 24
Statutory Policy	No
Required on Website	No
Review Period	2 Years
Next Review Date	July 26
Reviewed by	DPO

Contents

Revision History	Page 2
Purpose	Page 3
Scope	Page 3
Purposes of the CCTV System	Page 3
Storage, Monitoring & Recording	Page 4
Location of CCTV	Page 4
Retention & Disposal	Page 4
Data Protection	Page 5
Access & Disclosure	Page 5
Complaints	Page 6
Consultation	Page 6
Review	Page 6

Revision History

The below table provides the revision history for this document. Each revision has an associated date, issue number, and description of the changes and/or content. The document revisions appear in descending order, with the most-recent iteration appearing first in the table.

Date	Version	Description	Author
March 2023	o.a	Initial draft	Data Protection Officer
May 2023	o.b	Final Approved Version	Data Protection Officer/COO
July 2024	0.c	1 st Review, no changes	Sarah Burns Data2Action

1. Purpose

1.1 This policy aims to ensure that all CCTV systems installed and operated by each school within the Bishop Wilkinson Catholic Education Trust comply with the law and that the scope, purpose, use and management of the systems are clearly defined.

1.2 Andrew Carrick, site manager, is responsible for the overall management and operation of the CCTV system. This includes activities relating to installation, recording, reviewing, monitoring, and compliance with this policy.

1.3 The school will have due regard to the Data Protection Act 2018, the UK General Data Protection Regulation (GDPR) and any subsequent data protection legislation.

1.4 This policy will be reviewed annually by Anthony Morris, Head of School, to assess whether the use of the CCTV system remains justified, necessary, and proportionate. Changes to legislation, national guidance or codes of practice may also trigger interim reviews.

2. Scope

2.1 This policy applies to all staff, pupils, third parties and visitors who may visit the school and associated premises and includes the use of all surveillance technology used by the school.

2.2 Linked Documentation

This policy should be read in conjunction with the following documents:

- Data Protection Policy (BWCET)
- Acceptable Use of IT Systems Policy (BWCET)
- Information and Cyber Security Policy (BWCET)
- Data Retention Policy (BWCET)
- Keeping Children Safe in Education (DfE)

3. Purposes of the CCTV system

3.1 There are several purposes for the use of CCTV in the school. These purposes will be reviewed on a regular basis to ensure they continue to be necessary and justified.

3.2 The CCTV system may be used for the following purposes:

- The detection, prevention, reduction, and investigation of crime.
- Support with compliance of our regulatory requirements.
- Facilitate with the investigation of suspected breaches of School policies.
- Assist with health and safety and other serious occurrences.
- Create a safer environment.
- Detect, prevent, and reduce any incidences of internal misconduct.

4. Storage, monitoring, and recording

4.1 Live footage and images captured by the CCTV system must be monitored in a secure room/location within the school. All monitoring of the CCTV system must be in accordance with the purposes set out in Section 3 of this Policy and carried out by authorized personnel only.

4.2 Images are recorded and stored on central servers with the appropriate technical and organisational measures in place. Disaster recovery and business contingency plans must include the use of CCTV systems. The system must be routinely checked to ensure it is working correctly.

4.3 Images must not be recorded or saved onto any personal equipment. Any footage that is downloaded must be saved on school approved, secure and encrypted devices.

4.4 The misuse, tampering or unauthorised use of CCTV will be investigated and may lead to disciplinary action. Serious breaches of this policy may result in criminal liability on behalf of the individual.

4.5 Covert recording (recording which takes place without the individual's knowledge) will only be undertaken in extreme circumstances such as, when criminal acts have occurred in an area that was not previously covered by the CCTV, and if there is no other reasonable, less intrusive means of achieving those purposes. Any covert recordings must be requested and approved by the headteacher. Consultation with appropriate stakeholders, such as the Data Protection Officer may be required before approval is granted and all decisions must be recorded.

5. Location of CCTV

5.1 CCTV cameras are positioned specifically to capture images to assist with the purposes for installing them.

5.2 Appropriate and adequate signage must be displayed prominently at all entry points to the school building and premises to inform individuals that CCTV is in operation and images may be monitored and recorded.

5.3 A DPIA must be completed to ensure the location of all CCTV cameras are positioned as such to satisfy the purposes as set in section 3 of this policy. Cameras must not be placed in private areas such as toilet or changing facilities.

6. Retention and disposal

6.1 CCTV images will be retained for no longer than 30 days from the date of recording unless they form part of an investigation, are required for evidential purposes, or as required by law.

6.2 Access to retained images will be restricted to personnel who require it for the purposes listed above. These images must be reviewed regularly and disposed of securely once they are no longer required or necessary.

6.3 Any footage which has been downloaded must be disposed of using company approved, secure methods.

7. Data protection

7.1 The Trust (which includes all associated schools) is registered with the Information Commissioners Office (ICO) registration: ZA307087. Due regard is given to the data protection principles contained within Article 5 of the GDPR during the implementation stages and usage of the CCTV system.

7.2 The GDPR provides individuals with rights regarding the processing of their personal data. Individuals are entitled to request a copy of their data if they are recorded on CCTV, subject to exceptions in the DPA 2018.

7.3 Individuals have other rights in certain circumstances, including the right to have their personal data erased, rectified, to restrict processing and to object to the processing of their personal data.

7.4 Any requests for CCTV footage by individuals should be submitted to the school. Sufficient detail must be provided by the individual to allow the school to locate and identify the individual. An assessment, in conjunction with the DPO must be made first to ensure the lawfulness of sharing any such images.

7.5 If the school is unable to disclose the requested footage without the personal data of another individual who is identifiable from that information, it is not obliged to supply it unless that individual has provided consent, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

7.6 The school will respond to a Subject Access Request within one month of receiving the request including requests that are received during school holidays.

8. Access and disclosure

8.1 CCTV footage may only be accessed by authorised personnel who are sufficiently trained in the use of the system and are aware of their responsibilities.

8.2 Requests for footage made by third parties, such as the Police, Legal representatives, or an Insurance Company, should be made to the school. Certain exemptions may apply, so the school should consult with its Data Protection Officer and record any decisions before submitting any information.

8.3 Judgements for disclosure should be made based on the purpose of the request. For example, footage must be supplied to the Police if they request the information for the prevention or detection of crime, the prosecution or apprehension of offenders and/or protecting the vital interests of a person under schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6(1)(d).

8.4 A data sharing agreement will be in place with any third parties we may need to share personal information with regularly. This may be the case when third parties use school facilities outside or normal school hours, such as the sports facilities.

8.5 Where there is a suspicion of misconduct, the Headteacher may provide access to CCTV footage for the use of disciplinary cases.

8.6 Every disclosure of CCTV footage must be recorded by the Headteacher and include who requested the footage, brief details of the footage required, date and time of the recording and when it was supplied, the crime reference number (if relevant).

9. Complaints

Any complaints about the contents of this policy or the usage of CCTV, should be sent to:

Name: Anthony Morris
Job title: Head of School
Email: info@stms.bwcet.com
Telephone: 01207 232189

If the complainant is not satisfied with the response in relation to our responsibilities under the DPA 2018 and GDPR, they have the right to make a complaint to the ICO. The ICO would normally expect the individual to have exhausted our complaints policy first.

10. Consultation

This policy was written by the Data Protection Officer, in consultation with the Executive Team.

11. Review

This policy will be reviewed annually.