Windsor Academy Trust

Policy: CCTV Policy	
Responsible Committee:	People & Culture Committee
Date approved by the People and Culture Committee:	12th June 2025
Implementation date:	July 2025
Next review date:	July 2027

1. Introduction

1.1. Windsor Academy Trust (WAT) recognises that CCTV and sound recording systems can be a key tool in ensuring the effective safeguarding and security of school premises and the staff and students within. The use of such equipment helps to maintain the safety of all users as well as the premises themselves. Equally, WAT understands that CCTV and audio recording can be privacy intrusive.

For this reason, the school has carried out a data protection impact assessment with a view to evaluating whether the CCTV system in place is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the data protection impact assessment has informed the school's use of CCTV and the contents of this policy.

2. Objectives

2.1. Review of this policy shall be repeated regularly and may be updated when new equipment is introduced and as Code of Practice changes. Where a review is carried out review of the associated risk assessment will be completed. We aim to conduct reviews no later than every two years.

The legal basis of this policy and the use of CCTV and sound recording systems is to perform a public task through our educational establishments. The purpose of this policy and the associated CCTV and sound recording systems is to assist WAT and its schools in reaching the following objectives:

a. To ensure the public purpose of keeping children safe and well educated

b. To protect pupils/students, staff and visitors against harm to their person and/or property;

c. To increase a sense of personal safety and reduce the fear of crime;

d. To protect the trust schools, office buildings and assets;

e. To support the police in preventing and detecting crime;

f. To assist in identifying, apprehending and prosecuting offenders;

g. To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence; and

h. To assist in managing the Trust schools and offices.

i. To assist in upholding educational and professional standards

3. Purpose of This Policy

3.1. The purpose of this policy is to regulate the management, operation and use of the CCTV system (closed circuit television) used within WAT Academies and offices.

3.1.1. The CCTV system used by Windsor Academy Trust comprises of:

Camera Type	Location	Audio Capture	Recording Capacity	Swivel/Fixed
SNP	**Great Wyrley Office - Main Entrance**	**No**	**Yes**	**Fixed**

3.2. CCTV cameras and sound recording systems are not installed in areas in which individuals would have an expectation of privacy such as toilets, changing facilities, etc.

3.3. Some of our CCTV cameras capture audio as well as visual recordings (as detailed above). We understand that audio recording CCTV may be seen as highly intrusive. Therefore, we take the following steps:

- Have notices displayed in the school informing individuals that they are being audio recorded.
- Identified a requirement or issue that needs to be addressed by audio recording.
- Have the function to turn off audio recording.
- In line with the General Data Protection Regulations (GDPR and Data protection Act 2018, we have carried out a Data Protection Impact Assessment (DPIA) to ensure allowing the school to assess, manage and mitigate the risks associated with audio capture on our CCTV systems.

4. Statement of Intent

4.1. CCTV cameras are installed in such a way that they are not hidden from view. Signs are predominantly displayed where relevant so that staff, students, visitors and members of the public are made aware that they are entering a school that is covered by CCTV. The CCTV system will seek to comply with the requirements of both the Data Protection Act and the most recent Commissioner's Code of Practice.

4.1.1. WAT will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

4.1.2. The system has been designed so far as possible to deny observation on adjacent private homes, gardens and other areas of private property.

4.1.3. Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

4.1.4. Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images and recordings will never be released to the media for purposes of entertainment.

4.1.5. The planning and design has endeavored to ensure that the system will give maximum effectiveness and efficiency but it is not possible to guarantee that the

system will cover or detect every single incident taking place in the areas of coverage.

4.1.6. Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible on the site and make clear who is responsible for the equipment.

4.1.7. Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

4.1.8. CCTV images and sound recordings are not retained for longer than necessary, taking into account the purposes for which they are processed. Data storage is automatically overwritten by the system after a period of one month.

4.1.9. Recorded images and sounds will only be retained long enough for any incident to come to light (e.g., for a theft to be noticed) and the incident to be investigated. In the absence of a compelling need to retain images and sounds for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 6 months.

4.2. In addition to CCTV systems installed in our schools WAT also engages with external partners-to provide video recordings of lessons to aid pupil outcomes and teacher education.The external systems used within WAT schools are uniquely developed from research and best practice in supporting teachers and schools to enhance expertise through self reflection, enquiry, building teacher learning communities and coaching. It is important to note that tools used as part of these learning opportunities are not surveillance systems; they are permission based with multiple levels of security to ensure that teachers can feel confident and empowered by its use and remain in control throughout the process.

5. System Management

5.1. Access to the CCTV system and data shall be password protected and will be kept in a secure area.

5.2. The CCTV system will be administered and managed by David Buckley, Head of Digital Transformation and IT, who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager, the system will be managed by Paul Longdon, Network Manager.

5.3. The system and the data collected will only be available to the Systems Manager, their replacement and appropriate members of the senior leadership team as determined by the Headteacher.

5.4. The CCTV system is designed to be in operation 24 hours each day, every day of the year, though WAT does not guarantee that the CCTV will always be working and in operation during these hours.

5.5. The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.

5.6. Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by providing clear, usable images and/or sound recordings.

5.7. Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

5.8. Where a person other than those mentioned above, requests access to the CCTV data or system, the System Manager must satisfy themself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists, access will be refused.

5.9. Details of all visits and visitors will be recorded in a system log book including time/data of access and details of images viewed and the purpose for doing so.

6. Downloading Captured Data on to Other Media

6.1. In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings), any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures:

6.1.1. Each downloaded media must be identified by a unique mark.

6.1.2. Before use, each downloaded media must be cleaned of any previous recording.

6.1.3. The System Manager will register the date and time of downloaded media insertion, including its reference.

6.1.4. Downloaded media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a downloaded media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.

6.1.5. If downloaded media is archived, the reference must be noted.

6.1.6. If downloaded media is put onto a device, the device will be encrypted and password protected.

6.2. Images and/or sound recordings may be viewed by the police for the prevention and detection of crime and by the Systems Manager, their replacement and the Headteacher and other authorised senior leaders. However, where one of these people may be later called as a witness to an offense and where the data content may be used as evidence, it shall be preferable if possible, for that person to withhold viewing of the data until asked to do so by the police.

6.3. A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.

6.4. Should images and/or sound recordings be required as evidence, a copy may be released to the police under the procedures described in this policy. Images and/or sound recordings will only be released to the police on the clear understanding that the downloaded media (and any images and/or sound recordings contained thereon) remains the property of the school and downloaded media (and any images and/or sound recordings contained thereon) are to be treated in accordance with Data Protection legislation. WAT also retains the right to refuse permission for the police to pass the downloaded media (and any images and/or sound recordings contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media, this will be produced from the secure evidence store, complete in its sealed bag.

6.5. The police may require WAT to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until needed by the police.

6.6. Applications received from outside bodies (e.g., solicitors or parents) to view or release images and/or sound recordings will be referred to the school's Data Protection Lead and a decision made by a senior leader of the school in consultation with the WAT's Data Protection Officer.

7. Complaints About the Use of CCTV

7.1 Any complaints in relation to the school's CCTV system should be raised in accordance with the WAT Complaints Policy

8. Requests for Access by the Data Subject

8.1 The Data Protection Act provides data subjects – those whose image and/or sound recording has been captured by the CCTV system and can be identified - with a right to access data held about themselves, including those obtained by CCTV. Requests for such data should be made to Fenella Dziegiel on

fdziegiel@windsoracademytrust.org.uk.

9. Public Information

Copies of this policy will be available to the public from the Windsor Academy Trust website.