



CCTV Policy

Responsible for policy:

CC1 Finance, Resources and Premises

Policy Status:

Non- Statutory

Policy Review:

Biannually

Chair of Directors:

Sundar Jiwani

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Definitions

In this **CCTV policy**, unless the context otherwise requires, the following expressions shall have the following meanings:

- i 'The Romero Catholic Academy' means the Company named at the beginning of this **Data Protection Policy** and Procedure and includes all sites upon which the Company is undertaking, from time to time, being carried out. The Romero Catholic Academy includes; **Corpus Christi, Good Shepherd, Sacred Heart, Blue Sky, SS Peter and Paul, St Gregory, St John Fisher, St Patrick, Cardinal Wiseman, Shared Services Team**.
- ii 'Romero Catholic Academy' means the Company responsible for the management of the Academy and, for all purposes, means the employer of staff at the Company.
- iii 'Board' means the board of Directors of the Romero Catholic Academy.
- iv 'Chair' means the Chair of the Board or the Chair of the Local Governing Body of the Academy appointed from time to time, as appropriate.
- v 'Governance Professional' means the Governance professional to the Board or the Governance professional to the Local Governing Body of the Academy appointed from time to time, as appropriate.
- vi 'Chief Executive Officer' CEO means the person responsible for performance of all Academies and Staff within the Multi Academy Company and is accountable to the Board of Directors.
- vii 'Diocesan Schools Commission' means the education service provided by the diocese, which may also be known, or referred to, as the Birmingham Diocesan Education Service.
- viii 'Local Governing Body" means the governing body of the School.
- ix 'Governing Body Representatives' means the governors appointed and elected to the Local Governing Body of the School, from time to time.
- x 'Principal' means the substantive Principal, who is the person with overall responsibility for the day to day management of the school.
- xi 'School' means the school or college within The Romero Catholic Academy and includes all sites upon which the school undertaking is, from time to time, being carried out.
- xii 'Shared Services Team' means the staff who work in the central team across the Company (e.g. HR/ Finance)
- xiii 'Vice-Chair' means the Vice-Chair of the Governing Body elected from time to time.
- xiv 'Data Champion' means the person responsible for data protection across The Romero Catholic Academy
- xv 'Data Controller' means the person responsible for the school data ie Principal

1. Scope

- 1.1 This policy applies to all schools and sites within **The Romero Catholic Academy**, including Corpus Christi, Good Shepherd, Sacred Heart, Blue Sky, SS Peter and Paul, St Gregory, St John Fisher, St Patrick, Cardinal Wiseman, and the Shared Services Team.
- 1.2 It covers the use of all CCTV systems and dashcam devices operated by the Academy, including fixed and PTZ cameras, internal and external monitoring systems, and mobile surveillance on Academy minibuses.
- 1.3 The policy is relevant to all staff, students, visitors, contractors, and third parties who may be captured by surveillance systems while on Academy premises or vehicles.

Purpose and Justification

The Romero Catholic Academy will only use surveillance cameras for the safety and security of the school and its staff, students and visitors.

- Surveillance will be used as a deterrent for violent behaviour and damage to the school.
- The school will only conduct surveillance as a deterrent and under no circumstances will the surveillance and the CCTV cameras be present in standard school classrooms or any changing facility.
- If the surveillance and CCTV systems fulfil their purpose and are no longer required, the school will deactivate them.

The purpose of this policy is to outline the responsible use of CCTV systems across The Romero Catholic Academy to:

- Promote the safety and security of pupils, staff, visitors, and property
- Deter and detect criminal activity, anti-social behaviour, and misconduct
- Support investigations into incidents and disciplinary matters
- Ensure compliance with the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, and other relevant legislation
- Safeguard the privacy rights of individuals by setting clear standards for the collection, storage, access, and disclosure of CCTV footage

This policy is to be read in conjunction with the Academy's Data Protection Policy and other related procedures.

2. Statement of Intent

- 2.1 CCTV System at each school:
 - 2.1.1 The systems comprise of a number of fixed and PTZ cameras.
 - 2.1.2 The systems do not have sound recording capability with the exception of Cardinal Wiseman (please refer to table in Appendix for further details).
 - 2.1.3 The system is not linked to automated facial recognition or number plate recognition software thus all individuals' images are anonymous until viewed.
- 2.2 The CCTV system is owned and operated by the school, the deployment of which is determined by the school's Senior Leadership Team and SSO.
- 2.3 The CCTV is monitored from a secure office. The CCTV stores the images and is retained for a minimum of seven days to a maximum of 30 days. Access to the images is controlled by the school's Senior Leadership Team.
- 2.4 The introduction of, or changes to, CCTV monitoring will be subject to consultation with Facilities Manager of the Shared Services Team of The Romero Catholic Academy. The Data Champion will assess if a DPA's is required before implementing advanced surveillance technologies.
- 2.5 The Romero Catholic Academy CCTV Scheme is included in the registration with the Information Commissioner as a data processor.
- 2.6 All authorised operators and employees with access to images are aware of these procedures that need to be followed when accessing the recorded images. Through this policy, all operators are made aware of their responsibilities in following the CCTV Code of Practice. The school's 'Data Controller' (Principal) will ensure that all

employees are aware of the restrictions in relation to access to and disclosure of, recorded images by publication of this policy.

- 2.7 The school complies and acknowledges any guidance and revisions from Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:
<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>
- 2.8 The School's CCTV surveillance cameras are a passive technology that only records and retains images. They are not linked to automated decision making or facial or number plate recognition software. The Local Authority has a safer street program running at some schools within The Romero Catholic Academy, we have no access to this technology.
- 2.9 CCTV warning signs are clearly and prominently placed at the main external entrance to the school, including further signage in other outdoor areas in close proximity to camera positions. Signs will contain details of the purpose for using CCTV. In areas where CCTV is used, the school ensures prominent signs are placed within the controlled area.
- 2.10 The original planning, design and installation of CCTV equipment endeavoured to ensure that the scheme will deliver 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.
- 2.11 The cameras are sited so that they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated.
- 2.12 The school will make every effort to position cameras so that their coverage is restricted to the school premises, which includes outdoor/indoor areas. The system design is sympathetic to the privacy of surrounding public and does not monitor public space outside the legitimate areas of interest for the School.
- 2.13 CCTV will not be used in classrooms but in limited areas within the school building that have been identified as not being easily monitored at all times.
- 2.14 Members of staff will have access to details of where CCTV cameras are situated on the premises.

3. Covert Monitoring

- 3.1 It is not The Romero Catholic Academy's policy to conduct 'Covert Monitoring' unless there are 'exceptional reasons' for doing so. Any such monitoring would be temporary and be justified as 'exceptional'. The covert surveillance activities of public authorities are governed by the Regulation of Investigatory Powers Act (RIPA) 2000. Such type of recording is covert and directed at an individual or individuals. The school may, in exceptional circumstances, determine a sound reason to covert monitor via CCTV. For example: Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct; where notice about the monitoring would seriously prejudice the reason for making the recording.
- 3.2 In these circumstances authorisation must be obtained from a member of the senior leadership team and the school's 'Data Controller' advised before any commencement of such covert monitoring.
- 3.3 Covert monitoring must cease as soon as necessary, such as following completion of an investigation.
- 3.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles, changing areas etc.

4. Storage and Retention of CCTV images

- 4.1 Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.
- 4.2 All retained data will be stored securely at all times and permanently deleted as appropriate/required.
- 4.3 Recorded images will be kept for no longer than 30 days, except where there is lawful reason for doing so, such as discipline investigations. Images are deleted from the CCTV server.
- 4.4 Access to CCTV recorded images will be restricted to those staff authorised to view them and will not be made more widely available.

5. CCTV Access

- 5.1 Access to stored images will only be granted in the case of an incident. To be viewed in the course of the incident's investigation.

5.2 Subject Access Requests (SAR)

- 5.2.1 Individuals have the right to request access to CCTV footage that constitutes their personal data unless there are GDPR exemptions that apply.
- 5.2.2 All requests should be made directly to the school.
- 5.2.3 The school will inform the school **Data Protection Lead** of the requests and must be reported on the school Subject Access Request Log.
- 5.2.4 Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
- 5.2.5 The school will respond to requests within one month of receiving the written request. All requests must be logged using Appendix 1 and stored securely.
- 5.3 Disclosure of information from surveillance systems must be controlled and consistent with the purpose(s) for which the system was established. When disclosing surveillance images of individuals, particularly when responding to subject access requests, the school will consider whether the identifying features of any of the other individuals in the image need to be obscured. In most cases the privacy intrusion to third party individuals will be minimal and obscuring images will not be required. However, consideration will be given to the nature and context of the footage.
- 5.4 The subject will be supplied with a copy of the information in a permanent form. There are limited circumstances where this obligation does not apply. The first is where the data subject agrees to receive their information in another way, such as by viewing the footage. The second is where the supply of a copy in a permanent form is not possible or would involve disproportionate effort, whereby the disproportionate effort may incur an administration fee.

5.5 Access to and Disclosure of Images to Third Parties

- 5.5.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).
- 5.5.2 Requests for images and data should be made to the school directly.
- 5.5.3 The data may be used within the school's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.
- 5.5.4 Data transfer will be made securely and using encryption as appropriate.

6. Minibus Dashcam Recording

- 6.1 The Romero Catholic Academy minibuses are fitted with dashcams for the security of all passengers. Each bus is equipped with a video and audio device. Signs are visible on all buses to make passengers aware of CCTV recording.
- 6.2 Details of dashcams can be found in the table within the policy.

7. Legal Framework

This policy complies with UK GDPR, Data Protection Act 2018, Protection of Freedoms Act 2012, Regulation of Investigatory Powers Act 2000, Data (Use and Access) Act 2025, and Home Office Surveillance Camera Code of Practice., but not limited to, the following:

- Regulation of Investigatory Powers Act 2000
- Data (Use and Access) Act 2025
- Protection of Freedoms Act 2012
- The UK General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000
- The Education (Student Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- School Standards and Framework Act 1998
- Children Act 1989
- Children Act 2004
- Equality Act 2010

This policy operates in conjunction with the following statutory and non-statutory guidance:

- Home Office (2021) 'The Surveillance Camera Code of Practice'
- ICO (2021) 'Guide to the UK General Data Protection Regulation (UK GDPR)'
- ICO (2017) 'In the picture: A data protection code of practice for surveillance cameras and personal information'

This CCTV Policy is linked to our:

- Data Protection Policy
- Minibus Policy

8. Monitoring and Review

The Board of Directors delegate the implementation of this policy to the Academy Committee.

review biannually by CC1 Finance, Audit, Resources and Premises.

DPO training refresher training annually by DPO services.



The Romero Catholic Academy CCTV System

School	CCTV Type	Number of camera's on site			Retention of Recordings	Monitored by	Image Access
		Total	Static	PTZ			
Cardinal Wiseman Secondary School	PTZ/Static	77	65 static 2 fish eye	10	30 days	ADT	Principal, SBM, SSO and SST
Sacred Heart Primary School	Static	4	4	0	N/A	Internal Monitoring (no recording)	Principal, SBM, SSO and SST
Corpus Christi Primary School	PTZ/Static	15	12	3	30 days	Internal Monitoring	Principal, SBM, SSO and SST
St John Fisher Primary School	PTZ/Static	8	2	6	30 days	Site Watch	Principal, SBM, SSO and SST
SS Peter & Paul Primary School	Static	5	5	0	N/A	Internal Monitoring (no recording)	Principal, SBM, SSO and SST
St Patrick's Primary School	Static	3	3	0	30 days	Internal Monitoring	Principal, SBM, SSO and SST
Good Shepherd Primary School	PTZ 360	5	3 (dummy)	2	30 days	Oakwood	Principal, SBM, SSO and SST
St Gregory's Primary School	Static	4	4	N/A	30 days	Internal Monitoring	Principal, SBM, SSO and SST

The Romero Catholic Academy Minibus Dashcams

School	CCTV Type	Number of camera's on minibus	Retention of Recordings	Monitored by	Image Access
Cardinal Wiseman School	Dashcam	1 on each bus (Total 2)	24 hours Loop recording	Internal monitoring for accident and security purposes	Principal, SBM, SSO and SST
Sacred Heart Primary School	Dashcam	1	24 hours Loop recording	Internal monitoring for accident and security purposes	Principal, SBM, SSO and SST
Corpus Christi Primary School	Dashcam	1	24 hours Loop recording	Internal monitoring for accident and security purposes	Principal, SBM, SSO and SST
St John Fisher Primary School	Dashcam	1	24 hours Loop recording	Internal monitoring for accident and security purposes	Principal, SBM, SSO and SST
SS Peter & Paul Primary School	Dashcam	1	24 hours Loop recording	Internal monitoring for accident and security purposes	Principal, SBM, SSO and SST
St Patrick's Primary School	Dashcam	1	24 hours Loop recording	Internal monitoring for accident and security purposes	Principal, SBM, SSO and SST
Good Shepherd Primary School	Dashcam	1	24 hours Loop recording	Internal monitoring for accident and security purposes	Principal, SBM, SSO and SST
St Gregory's Primary School	Dashcam	1	24 hours Loop recording	Internal monitoring for accident and security purposes	Principal, SBM, SSO and SST



Appendix 1