



DIOCESE OF
ST ALBANS
MULTI-ACADEMY TRUST

Trust CCTV Policy

Policy type	Trust wide with local context (based on The Key model policy with input from Handsam and PEL)
Review	Every two years
Author/Responsible Officer	Governance Officer
Approved by	Head of Governance
Date of approval	Sept 2025
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This policy is a non-statutory policy for all DSAMAT Academies that have CCTV and must be implemented with local amendments



Our mission, vision and values

The Trust has a clear **mission** at its core, ensuring that all pupils are enabled to flourish, rooted in God's Love - academically, socially, spiritually, physically and mentally. This is central to our work and rooted in our Christian foundation (John 10 v 10). Our commitment to mutual flourishing within the school community is built upon our shared belief in Church of England principles. In our Trust, just as in the wider Church of England community, 'flourish' refers to prospering, thriving and growing. It means prayerfully encouraging all within our schools so that they might prove fruitful, successful and contented in the longer term. We seek to provide space generously for all to flourish in life and all of its structures. Equitable treatment for all pupils, staff and the wider community is a core part of enabling this long term, holistic flourishing.

every school in the Trust to continuously improve. All schools provide rich and diverse curricula which evolve to meet the needs of their children and local communities, as well as delivering educational excellence to enable them to continue to flourish in later life.

The way we work and deliver against our mission is critical to our Trust. We have shared, agreed **values** of:

Hope; Nurture; Equality; Respect; Collaboration

The Trust's vision is underpinned by a Christian values framework which is adopted by all schools. It provides clear expectations for all Trust employees on how we wish our values to impact on all areas of school life. It draws on, and is informed by, the National Church of England Vision for Education and the Diocesan Board of Education Vision.

Each school within the Trust has a personalised vision for education, developed locally to reflect the individual character and needs of the school community. This vision is underpinned by the Trust's wider vision, and agreed with the Trust, but it is owned and driven by the headteacher and their LGB.

Our community

The Trust are dedicated to delivering education that serves local communities. Our schools are inclusive, welcoming those from all and no faiths, from all abilities and backgrounds. We believe in providing a high-quality education, underpinned by Christian values, which enables every child to flourish.

Underpinning all of the Trust's work is a belief in educational excellence. The Trust serves all stakeholders by providing schools with the highest levels of academic rigour and pastoral care.

Our schools are places where children and young people develop and thrive intellectually, socially, culturally, and spiritually. All of the Trust's schools teach a broad and balanced curriculum within national guidelines focusing on core skills. This is designed to ensure that all pupils reach their academic potential and seek to enrich their experience along the way. Pupils will be enabled to succeed in an atmosphere of high expectation, aspiring to educational excellence with a firm foundation of values.

This policy forms part of our Trust governance and ensures that we are held to the highest standards as we carry out our duties.

Statement of Intent

This is the Diocese of St Albans Multi-Academy Trust (DSAMAT) over-arching CCTV policy and must be implemented and adhered to in each of the academies that have CCTV within the Diocese of St Albans Multi Academy Trust along with those working within the central team.

For the remainder of this document, the Diocese of St Albans Multi Academy Trust will be referred to as DSAMAT.



Contents

1. Aims	4
2. Relevant legislation and guidance	4
3. Definitions	5
4. Covert surveillance	5
5. Location of the cameras	5
6. Roles and responsibilities	5
7. Operation of the CCTV system	6
8. Storage of CCTV footage	7
9. Access to CCTV footage	7
10. Data protection impact assessment (DPIA)	8
11. Security	8
12. Complaints	8
13. Monitoring	8
14. Links to other policies	9
15. Access Log	10



1. Aims

This policy aims to set out the school's approach to the operation, management and usage of surveillance and closed-circuit television (CCTV) systems on school property.

1.1 Statement of intent

The purpose of the CCTV system is to:

- Make members of the school community feel safe
- Protect members of the school community from harm to themselves or to their property
- Deter criminality in the school
- Protect school assets and buildings
- Assist police to deter and detect crime
- Determine the cause of accidents
- Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings
- To assist in the defense of any litigation proceedings

The CCTV system will not be used to:

- Encroach on an individual's right to privacy
- Monitor people in spaces where they have a heightened expectation of privacy (including toilets and changing rooms – One camera in the building which can be found in the Office Area)
- Follow particular individuals, unless there is an ongoing emergency incident occurring
- Pursue any other purposes than the ones stated above

The list of uses of CCTV is not exhaustive and other purposes may be or become relevant.

The CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The system complies with the requirements of the Data Protection Act 2018 and the UK GDPR.

Footage or any information gleaned through the CCTV system will never be used for commercial purposes.

In the unlikely event that the police request that CCTV footage be released to the media, the request will only be complied with when written authority has been provided by the police, and only to assist in the investigation of a specific crime.

The footage generated by the system should be of good enough quality to be of use to the police or the court in identifying suspects.

2. Relevant legislation and guidance

This policy is based on:

2.1 Legislation

- [UK General Data Protection Regulation](#)
- [Data Protection Act 2018](#)
- [Human Rights Act 1998](#)
- [European Convention on Human Rights](#)
- [The Regulation of Investigatory Powers Act 2000](#)
- [The Protection of Freedoms Act 2012](#)
- [The Education \(Pupil Information\) \(England\) Regulations 2005 \(as amended in 2016\)](#)



- [The Freedom of Information and Data Protection \(Appropriate Limit and Fees\) Regulations 2004](#)
- [The School Standards and Framework Act 1998](#)
- [The Children Act 1989](#)
- [The Children Act 2004](#)
- [The Equality Act 2010](#)

2.2 Guidance

- [Surveillance Camera Code of Practice \(2021\)](#)

3. Definitions

- Surveillance: the act of watching a person or a place
- CCTV: closed circuit television; video cameras used for surveillance
- Covert surveillance: operation of cameras in a place where people have not been made aware they are under surveillance

4. Covert surveillance

Covert surveillance will only be used in extreme circumstances, such as where there is suspicion of a criminal offence. If the situation arises where covert surveillance is needed (such as following police advice for the prevention or detection of crime or where there is a risk to public safety), a data protection impact assessment will be completed in order to comply with data protection law.

5. Location of the cameras

Cameras are located in places that require monitoring in order to achieve the aims of the CCTV system (stated in section 1.1).

Cameras are located on –

- the outside of the school's main building
- outside of the external school buildings
- the school gate
- in the main office area.

Wherever cameras are installed appropriate signage is in place to warn members of the school community that they are under surveillance. The signage:

- Identifies the school as the operator of the CCTV system
- Identifies the school as the data controller
- Contact details for the school is stated on the board alongside the frontgate

Where Cameras are aimed off school grounds into public spaces or people's private property, residents will be contacted and a signed agreement outlining how and for what purposes the footage can be requested will be put in place. Public areas such as the Church Yard has been obscured on the camera.

Cameras are positioned in order to maximise coverage, but there is no guarantee that all incidents will be captured on camera.

6. Roles and responsibilities

6.1 The Trust board

The Trust board has the ultimate responsibility for ensuring the CCTV system is operated within the parameters of this policy and that the relevant legislation (defined in section 2.1) is complied with.



6.2 The DSAMAT data manager

The DSAMAT data manager will:

- Train persons with authorisation to access the CCTV system and footage in the use of the system and in data protection
- Train all staff to recognise a subject access request
- Deal with subject access requests in line with the UK GDPR and Data Protection Act 2018
- Monitor compliance with UK data protection law
- Advise on and assist the school with carrying out data protection impact assessments
- Act as a point of contact for communications from the Information Commissioner's Office (ICO)
- Conduct data protection impact assessments
- Ensure data is handled in accordance with data protection legislation
- Ensure footage is obtained in a legal, fair and transparent manner
- Ensure footage is destroyed when it falls out of the retention period
- Keep accurate records of all data processing activities and make the records public on request
- Inform subjects of how footage of them will be used by the school, what their rights are, and how the school will endeavour to protect their personal information
- Ensure that the CCTV systems are working properly and that the footage they produce is of high quality so that individuals pictured in the footage can be identified
- Ensure that the CCTV system is not infringing on any individual's reasonable right to privacy in public spaces
- Carry out termly checks to determine whether footage is being stored accurately, and being deleted after the retention period
- Receive and consider requests for third-party access to CCTV footage

6.3 The headteacher

The headteacher will:

- Take responsibility for all day-to-day leadership and management of the CCTV system
- Liaise with the DSAMAT data manager to ensure that the use of the CCTV system is in accordance with the stated aims and that its use is needed and justified
- Ensure that the guidance set out in this policy is followed by all staff
- Review the CCTV policy to check that the school is compliant with legislation
- Ensure all persons with authorisation to access the CCTV system and footage have received proper training from an appropriate person in the use of the system and in data protection
- Sign off on any expansion or upgrading to the CCTV system, after having taken advice from the DPO / Handsam / DSAMAT data manager and having taken into account the result of a data protection impact assessment
- Decide, in consultation with the DPO / Handsam, whether to comply with disclosure of footage requests from third parties

6.4 The system manager (PEL)

The system manager will:

- Take care of the day-to-day maintenance and operation of the CCTV system
- Oversee the security of the CCTV system and footage
- Check the system for faults and security flaws termly
- Ensure the data and time stamps are accurate termly

7. Operation of the CCTV system

- The CCTV system will be operational 24 hours a day, 365 days a year.
- The system is registered with the Information Commissioner's Office.
- The system will not record audio.
- Recordings will have date and time stamps. This will be checked by the system manager termly and when the clocks change.



8. Storage of CCTV footage

- Footage will be retained for 30 days. At the end of the retention period, the files will be overwritten automatically.
- On occasion footage may be retained for longer than 30 days, for example where a law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation.
Recordings will be downloaded and encrypted, so that the data will be secure and its integrity maintained, so that it can be used as evidence if required.
- The DSAMAT data manager will carry out termly checks to determine whether footage is being stored accurately and being deleted after the retention period.

9. Access to CCTV footage

- Access will only be given to authorised persons, for the purpose of pursuing the aims stated in section 1.1, or if there is a lawful reason to access the footage.
- Any individuals that access the footage must record their name, the date and time, and the reason for access in the access log (see end of the policy).
- Any visual display monitors will be positioned so only authorised personnel will be able to see the footage.

9.1 Staff access

Add to/amend this section according to your own procedures.

- The following members of staff have authorisation to access the CCTV footage:
 - Site Agent: Neil Butler
 - The headteacher: Natasha Chiswell
 - The deputy head: Della Mitra
 - The DSAMAT data manager: Jeni Houghton
 - The system manager: Partnership Education Ltd
 - The designated safeguarding lead: Della Mitra
 - Anyone with express, documented permission of the headteacher
- CCTV footage will only be accessed from one of the authorised personnel's work devices, or from the visual display monitors.
- All members of staff who have access will undergo training to ensure proper handling of the system and footage.
- Any member of staff who misuses the surveillance system may be committing a criminal offence and will face disciplinary action.

9.2 Subject access requests (SAR)

- According to the UK GDPR and Data Protection Act 2018, individuals have the right to request a copy of any CCTV footage of themselves. Upon receiving SAR the school will immediately issue a receipt and will then respond within 1 calendar month.
- All staff have received training to recognise SARs. When a SAR is received staff should inform the DPO in writing. When making a request, individuals should provide the school with reasonable information such as the date, time and location the footage was taken to aid school staff in locating the footage.
- On occasion the school will reserve the right to refuse a SAR, if, for example, the release of the footage to the subject would prejudice an ongoing investigation.
- Images that may identify other individuals need to be obscured to prevent unwarranted identification. The school will attempt to conceal their identities by blurring out their faces, or redacting parts of the footage. If this is not possible the school will seek their consent before releasing the footage. If consent is not forthcoming the still images may be released instead.
- The school reserves the right to charge a reasonable fee to cover the administrative costs of complying with a SAR that is repetitive, unfounded or excessive.
- Footage that is disclosed in a SAR will be disclosed securely to ensure only the intended recipient has access to it.



- The files will be shared securely via OneDrive or Google Drive.
- Records will be kept that show the date of the disclosure, details of who was provided with the information (the name of the person and the organisation they represent), and why they required it.
- Individuals wishing to make an SAR can find more information about their rights, the process of making a request, and what to do if they are dissatisfied with the response to the request on the [ICO website](#).

9.3 Third-party access

- CCTV footage will only be shared with a third party to further the aims of the CCTV system set out in section 1.1 (e.g. assisting the police in investigating a crime).
- Footage will only ever be shared with authorised personnel such as law enforcement agencies or other service providers who reasonably need access to the footage (e.g. investigators).
- All requests for access should be set out in writing and sent to the headteacher and the DSAMAT data manager.
- The school will comply with any court orders that grant access to the CCTV footage. The school will provide the courts with the footage they need without giving them unrestricted access. The DSAMAT data manager will consider very carefully how much footage to disclose and seek legal advice if necessary.
- The DSAMAT data manager will ensure that any disclosures that are made are done in compliance with the UK GDPR.
- All disclosures will be recorded by the DSAMAT data manager.

10. Data protection impact assessment (DPIA)

- The school follows the principle of privacy by design. Privacy is taken into account during every stage of the deployment of the CCTV system, including its replacement, development and upgrading.
- The system is used only for the purpose of fulfilling its aims (stated in section 1.1).
- When the CCTV system is replaced, developed or upgraded a DPIA will be carried out to be sure the aim of the system is still justifiable, necessary and proportionate.
- The DPO (Handsam) will provide guidance on how to carry out the DPIA. The DPIA will be carried out by the Headteacher or the DSAMAT data manager.
- Those whose privacy is most likely to be affected, including the school community and neighbouring residents, will be consulted during the DPIA, and any appropriate safeguards will be put in place.
- A new DPIA will be done annually and/or whenever cameras are moved, and/or new cameras are installed.
- If any security risks are identified in the course of the DPIA, the school will address them as soon as possible.

11. Security

- The system manager will be responsible for overseeing the security of the CCTV system and footage
- The system will be checked for faults once a term
- Any faults in the system will be reported as soon as they are detected and repaired as soon as possible, according to the proper procedure
- Footage will be stored securely and encrypted
- The CCTV footage will be password protected, and any camera operation equipment will be securely locked away when not in use
- Proper cyber security measures will be put in place to protect the footage from cyber attacks (see Cyber Security Policy)
- Any software updates (particularly security updates) published by the equipment's manufacturer that need to be applied, will be applied as soon as possible

12. Complaints

Complaints should be made in accordance with the DSAMAT Complaints policy.

13. Monitoring



The DSAMAT schools' CCTV system should be constantly reviewed to monitor their effectiveness and impact on the school community. It is not acceptable for a school simply to install CCTV cameras and forget about the impact they may be having.

A policy of constant review is one way of demonstrating that the use of CCTV is only for specific purposes. Should cameras be present in classrooms, staff must remain confident that the system's use has not been extended, even inadvertently or casually, into any formal or informal process of performance management or capability procedures.

The Trust will monitor the implementation of the policy and check annually that DSAMAT has registered with the Information Commissioner's Office.

The headteacher and DSAMAT data manager will monitor the effectiveness of the policy and will report to the Trust at least annually.

The Trust will review this policy at least every two years and assess its implementation and effectiveness. The policy will be promoted and implemented throughout the school.

14. Links to other policies

This policy should be considered in conjunction with following policies:

- Cyber Security Policy
- Data protection Policy
- Privacy notices for parents/carers, pupils, staff, governors and suppliers
- Safeguarding and Child Protection Policy



15. Access Log

Date / Time of request	Person/s Requesting and role	Reason for Request and Footage Requested	Stored?	Authorisation given and reason	Date for Destruction	Released By	Camera / Location
			Y / N				
			Y / N				
			Y / N				
			Y / N				
			Y / N				
			Y / N				
			Y / N				
			Y / N				
			Y / N				
			Y / N				
			Y / N				

Enabling all to flourish: Rooted in God's love