

University of Chichester Academy Trust

CCTV 2026-2028

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1 Introduction

- 1.1 A number of our academies have a CCTV surveillance system “the CCTV system” across its premises. This policy details the purpose, use and management of the CCTV system in the schools and details the procedures to be followed in order to ensure that the schools comply with relevant legislation and the current Information Commissioner’s Office Code of Practice.
- 1.2 The schools recognise that CCTV systems can be privacy intrusive. Each school will complete a data protection impact assessment (DPIA) to evaluate whether the CCTV system should be installed, or as a result of needing to be moved, upgraded, or because of capability changes. The DPIA will risk assess to ensure the CCTV is a necessary and proportionate means of achieving the legitimate objectives set out in section 2.

2 Purpose of the CCTV system

- 2.1 The purpose of this CCTV policy is to regulate the management, operation, and use of the CCTV system (closed circuit television) at the schools. CCTV images are monitored and recorded in strict accordance with this policy.
- 2.2 The purpose of the CCTV system is to assist the schools in reaching the following objectives:
 - To ensure the safety of pupils, staff, visitors and members of the public against harm to their person and/or property
 - To increase a sense of personal safety and reduce the fear of crime
 - To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence
 - To protect the school buildings and assets under surveillance to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.
 - To support the police in preventing and detecting crime
 - To assist in identifying, apprehending and prosecuting offenders
 - To assist in managing the school



2.3 CCTV will **not** be used for:

- Routine monitoring of staff performance, including lesson observations
- Monitoring students for non-safeguarding or non-behavioural purposes
- Never will cameras be placed where it is possible to see people using the toilet or changing. Monitoring private areas such as using toilet facilities or changing rooms should only have cameras used in the toilet handwashing areas, where the cubicles are full height and privacy for personal care is maintained.
- Covert surveillance, except in exceptional circumstances authorised by the Headteacher and in line with legal frameworks.
- Commercial purposes.

3 Legislation

- 3.1 We process CCTV images under UK GDPR Article 6(1)(e) **public task** to safeguard pupils, staff, visitors, and the wider school community and to prevent and detect crime. Where processing is undertaken that is not carried out under official authority, we rely on Article 6(1)(f) **legitimate interests** as our **lawful basis** and maintain a Legitimate Interests Assessment (LIA) where we assess purpose, necessity and balancing the schools' interests with the rights and freedoms of the individuals.
- 3.2 The schools will conform to the requirements of the:
- Data Protection Act 2018, the General Data Protection Regulation (GDPR), and any subsequent data protection legislation. Due regard will be given to the data protection principles contained within.
 - a) processed lawfully, fairly and in a transparent manner
 - b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
 - c) adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed
 - d) accurate and, where necessary, kept up to date
 - e) kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed
 - f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.
 - Data (Use and Access) Act 2025 (UK): recognised legitimate interest under Article 6(1)(ea) of UK GDPR, Regulation of Investigatory Powers Act 2000 and Regulation of Inv.
 - Freedom of Information Act 2000, the Protection of Freedoms Act 2012, and the Human Rights Act 1998.
- 3.3 Although not a relevant authority, the schools will also have due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012 and in particular the 12 guiding principles contained therein.
- 3.4 All storage used for images, recorded or downloaded for investigations, must be in compliance with GDPR rules, on secure storage on premise or on cloud storage within the EEA.



- 3.5 University of Chichester Academy Trust (CAT). CAT is registered with the Information Commissioner's Office (ICO). The registration number is ZA014574.

4 CCTV System Overview

- 4.1 The CCTV system is owned and managed by the school with an appointed data champion who is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring, and ensuring compliance with this policy.
- 4.2 Signage is prominent, visible and readable at all entrances and monitored areas to inform individuals that CCTV is in operation and signposting further information.
- 4.3 Cameras are located in key internal and external areas of the school sites.
- 4.4 Audio is disabled on all cameras. Any temporary activation will be clearly signposted and limited to the specific function. A DPIA would be carried out to initiate a temporary activation.
- 4.5 Each school will have maintain a record of the CCTV system used by the school, the number of cameras and location. This information can be provided on request.
- 4.6 The data controller for the CCTV images held by the school is the University of Chichester Academy Trust. The Trust's Data Protection Officer (DPO) can be contacted via unicat@chi.ac.uk or by telephone on 01243 793424.
- 4.7 Clearly visible signs are placed at all pedestrian and vehicular entrances to inform staff, pupils, parents, visitors, and members of the public that CCTV is in operation. The signage indicates that the system is managed by the school and a contact number is provided, if appropriate.
- 4.8 Cameras are sited to ensure that they cover school premises as far as is possible. Cameras are installed throughout the school's sites including roadways, car parks, buildings (internal and external), within buildings and externally in vulnerable public facing areas. Cameras are not sited to focus on private residential areas. Where cameras overlook residential areas, privacy screening or software masking will be utilised.
- 4.9 The CCTV system is operational and capable of being monitored 24 hours a day, every day of the year.

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 Cameras are not subject to 24-hour monitoring but are viewed when an incident requires investigating. The initial viewing of CCTV images (live and recorded) is restricted to the school's Data Champion/Academy Operations Officer. However, where issues relating to students' behaviour, security, protection of property or safeguarding are in question, the viewing of such images is further delegated to relevant school staff for safeguarding, HR, pupil support, senior leaders, academic and pastoral leaders. If an issue triggers the necessity of a meeting of the members of the Local Governing Body (i.e. relating to behaviour matters), then the right to view recorded CCTV images is delegated to the named members of that meeting.
- 5.3 Images are recorded centrally on servers located securely via our IT provider; footage is stored on UK/EEA resident systems. No international transfers occur.
- 5.4 Footage is viewable in restricted offices by CCTV trained staff: Data Champion, Operations Officer, Pupil Support and Guidance Department, SLT, and Academic and Pastoral Leaders.



- 5.5 A log shall be kept of requests to access recorded images by staff and whether any recorded images have been copied to support specific investigations. Information logged (Appendix 2) should include the name of staff, time and date of viewing, time and date of images reviewed, brief reason for viewing content (e.g. “incident in corridor”) but should not contain names, in addition to whether any images have been copied and where they have been copied to.
- 5.6 The cameras installed shall provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras and equipment are checked regularly to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.
- 5.7 All images recorded by the CCTV System remain the property and copyright of University of Chichester Academy Trust. The recorded images are stored on a server off site. Downloaded footage used in investigations is securely stored, on an encrypted data drive in accordance with the process outlined in the retention of images section.

6 Applications for disclosure of images

Applications by individual data subjects

- 6.1 Requests by individual data subjects for images relating to themselves “Subject Access Request” (SAR) should be submitted in writing. Please refer to our SAR procedures.
- 6.2 In order to locate the images on the school’s system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.
- 6.3 Particular care should be exercised when images of other people are included in the materials for disclosure. Images of other individuals will, if possible, be redacted unless there would be an expectation that their images would be released in such circumstances. Non-disclosure will be appropriate in most circumstances. If there is any doubt about what information must be provided to enquirers, please contact the school’s Data Champion.
- 6.4 Where the school is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual. Any decision to withhold the requested images must be referred to the Trust’s Data Protection Officer or their team of Data Champions as there are specific rules that must be adhered to when applying the exemptions contained in the Data Protection Act 2018.

Access to and disclosure of images to third parties

- 6.5 A request for images made by a third party should be made in writing.
- 6.6 In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.
- 6.7 All unexpected requests for CCTV images by a third party, including requests made by the police, should be referred to the school’s Data Champion in the first instance and if not available to the Trust’s Data Protection Officer or their team, who will advise on the application of any appropriate exemptions.



- 6.8 A record of any disclosure made under this policy will be held on the CCTV management system, itemising the date, time, camera, requestor, authoriser, and reason for the disclosure.

7 Retention of images

- 7.1 Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will apply a retention period of 30 days and will be automatically overwritten after this point.
- 7.2 The automatic deletion of data after the defined retention period should be checked on a half termly basis. This should be logged on a half termly basis by the Data Champion.
- 7.3 Where an image is required to be held in excess of the retention period referred to in 7.1, the Data Protection Officer will be responsible for authorising such a request. A record of these stored images will be kept within the CCTV viewing log.
- 7.4 Images held in excess of their retention period will be reviewed on a three-monthly basis and any not required for evidential purposes will be deleted. The CCTV monitoring log will provide evidence of the images which have been held and where they are kept. When deleted this should be recorded in the CCTV monitoring log. Access to retained CCTV images is restricted to the Data Protection Officer, the Headteacher and other persons as required and as authorised by the Headteacher or Trust's Data Protection Officer.

8 Complaints Procedure

- 8.1 Complaints concerning the school's use of its CCTV system or the disclosure of CCTV images should be made in writing to the Headteacher of the individual academy.
- 8.2 Any complaint will be managed in accordance with the school's complaints policy. The Headteacher will inform the Data Protection Officer.
- 8.3 All appeals against the decision of the Headteacher should be made in writing to the Trust's Data Protection Officer via unicat@chi.ac.uk

9 Policy Approval

- 9.1 The CCTV Policy and procedures will be reviewed annually by the Trust's Data Protection Officer with reference to the relevant legislations or guidance in effect at that time. The University of Chichester Academy Trust's Executive Team have the delegated authority to approve this policy and any subsequent reviews.
- 9.2 This policy will be reviewed whenever new equipment is introduced and a risk assessment conducted.
- 9.3 All staff involved in the operation, monitoring and compliance of the school's CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.

10 Links with other policies

- 10.1 This policy links with our policies on our Trust website [here](#):
- Data Protection Policy
 - Information Governance Policy

11 Appendices



11.1 CCTV Equipment Log

11.2 CCTV Viewing Log