

# **Walsall Academy**



## **CCTV Policy**

|                                          |                                                                                     |
|------------------------------------------|-------------------------------------------------------------------------------------|
| <b>Policy Title</b>                      | <b>CCTV Policy</b>                                                                  |
| <b>Policy Reference</b>                  | <b>WA/CCTV</b>                                                                      |
| <b>Description</b>                       | <b>This document sets out procedures relating to the CCTV protocol</b>              |
| <b>Status</b>                            | <b>Statutory</b>                                                                    |
| <b>Category</b>                          | <b>Academy</b>                                                                      |
| <b>Person Responsible</b>                | <b>J Clarke – Shadow Headteacher<br/>M Khan – Manager of IT</b>                     |
| <b>Version</b>                           | <b>V 1.3 November 2025</b>                                                          |
| <b>Other relevant policies</b>           |                                                                                     |
| <b>Adopted by the Governing Board on</b> |                                                                                     |
| <b>Next Review Due</b>                   | <b>November 2026</b>                                                                |
| <b>Data Protection</b>                   | <b>UK General Data Protection Regulations (UKGDPR) and Data Protection Act 2018</b> |

| <b>Version Records</b> |                      |                                                  |
|------------------------|----------------------|--------------------------------------------------|
| <b>Version</b>         | <b>Date</b>          | <b>Description</b>                               |
| <b>1.1</b>             | <b>March 2024</b>    | <b>New Policy</b>                                |
| <b>1.2</b>             | <b>March 2025</b>    | <b>Annual Review</b>                             |
| <b>1.3</b>             | <b>November 2025</b> | <b>Review of authorisations and body cameras</b> |
| <b>1.4</b>             |                      |                                                  |
| <b>1.5</b>             |                      |                                                  |
| <b>1.6</b>             |                      |                                                  |
| <b>1.7</b>             |                      |                                                  |

# **CCTV POLICY**

Walsall Academy uses closed-circuit television (CCTV) in order to protect the safety of students, staff, parents/carers and visitors.

This policy outlines how Walsall Academy uses CCTV in line with the principles set out within the Surveillance Camera Code of Practice 2021. All personal data obtained is stored in accordance with UK General Data Protection Regulations (UKGDPR) and Data Protection Act 2018.

## **The CCTV recordings may be used for:**

- prevention and detection of crimes, in the Academy and on the premises
- student behaviour management, discipline and exclusions
- staff disciplinary and associated processes and appeals
- maintaining a safe environment for the whole Academy community

## **CCTV system operation**

The CCTV system will be operational 24 hours a day, 365 days a year.  
The Data Controller is registered with the Information Commissioner's Office.  
The system does not record audio except for the security body camera.  
All recordings will have date and time stamps.

## **Location of cameras**

The cameras are located in places that require monitoring in order to achieve the purpose of the CCTV system.

Appropriate signs are displayed around the Academy premises within prominent locations that clearly identifies that CCTV recording is in operation. All main entrance areas to the Academy (Main Reception, PE, Theatre entrance and Restaurant entrance)

## **General access to CCTV footage**

It will not be common practice to release CCTV footage unless satisfactory evidence for a secure legal basis can be provided. This is authorised within Section 115, Crime and Disorder Act 1998.

In appropriate circumstances, the Academy may allow authorised personnel to view footage where the above purposes are considered

Walsall Academy will maintain a record of all disclosures.

All requests for access should made in writing to the Headteacher Simon Topper and be specific to a date and time frame.

Any disclosure will be done in line with UK GDPR and Data Protection.

The Academy cannot guarantee disclosure of footage when made under a Subject Access Request due to:

- lack of technical resources available in order to blur or redact the footage
- the release of footage would prejudice an ongoing investigation
- other identifiable individuals have not consented

### **Authorised CCTV system operators**

Walsall Academy has limited staff members, who are fully trained and understand the importance of confidentiality, authorised to access and operate the CCTV system.

The authorised personnel within Walsall Academy are:

- Mr Simon Topper, Headteacher
- Mr Maruf Khan – Manager of IT
- Mr Jon Clarke, Shadow Headteacher i/c Site/Premises Manager

### **Storage of footage**

Footage will be retained for no longer than necessary to achieve the purposes of the system.

The retention period will be 30 days. At the end of the retention period, the files will be deleted.

On occasions, footage may be retained for longer than 30 days. For example, where a law enforcement body is investigating a crime.

Recordings will be downloaded and encrypted, so that the data will be secure, and its integrity maintained, to ensure it can be used as evidence if required.

All recordings must be logged and traceable throughout their life within the system.

### **CCTV system security**

A full Data Privacy Impact Assessment will be completed upon deployment, replacements, development or upgrading of the CCTV system. This is in line with the UK GDPR principle, Privacy by Design, and ensures the aim of the system is reasonable, necessary and proportionate.

The system will be made secure by the following safeguards:

- the Head of IT Services will be responsible for overseeing the security of the footage and recorded images, maintenance and training of authorised personnel
- the system will be checked for faults each week
- the footage will be stored securely and encrypted
- the software updates will be installed as soon as possible
- the recorded footage will be password protected
- the equipment will be located in a secured lockable enclosure accessible only to authorised personnel
- adequate cyber security measures will be in place to protect footage from cyber-attacks
- a register of authorised staff is maintained, reviewed and updated when necessary

### **Covert recording**

The Academy will only 'covert record' when the following criteria are met:

- an assessment concluded that if we had to inform individuals that recording was taking place it would prejudice our objective
- there is reasonable cause to suspect specific criminal activity or actions that could result in a serious breach of staff or volunteer behaviour expectations is taking place
- covert processing is carried out for a limited and reasonable period of time and related to specific suspected criminal activity
- if the situation arises where the Academy adopts 'covert recording', there will be a clear documented procedure which sets out how the decision to record covertly was reached, by whom and the risk of intrusion on individuals

### **Body Cameras**

Walsall Academy will take full responsibility for ensuring that all recordings are collected, stored, and processed in accordance with the UK GDPR and the Data Protection Act 2018.

All footage would be:

- Stored securely on an encrypted UK-based cloud server, accessible only to authorised members of our management team and Data Protection Officer.
- Retained for 30 days, after which it is automatically and permanently deleted unless the footage is required for an ongoing investigation, safeguarding concern, police enquiry, or complaint.
- Shared only with approved recipients, such as the police or the school's safeguarding/leadership team, under the terms of our Data Sharing Agreement.

Our Body-Worn Video Policy is compliant with ICO guidance on the use of surveillance in educational environments. Clear signage will also be displayed at the school entrances to inform staff, students, and visitors that recording may occur for safety and security purposes.

### **Complaints**

Any complaints should be made in writing to the Manager of IT:

- Mr Maruf Khan
- Email address:-MKhan@walsallacademy.com

### **Review and monitoring**

Appropriate changes will be made accordingly in line with changes to legislation.

The Headteacher will communicate changes to all authorised staff members. This policy will be reviewed on an annual basis.