



**The Rivers**  
C.of E. Academy Trust

# CCTV Principles

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## Statement

The Rivers C of E Academy Trust may choose to use Close Circuit Television ("CCTV") within the premises of the trust and its schools. The purpose of this document is to set out the position of the trust as to the management, operation and use of the CCTV at the trust sites.

This document applies to all members of our workforce, visitors to the trust/schools' premises and all other persons whose images may be captured by the CCTV system.

These principles and procedures take account of all applicable legislation and guidance, including:

- General Data Protection Regulation ("GDPR")
- Data Protection Act 2018 (together the Data Protection Legislation)
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998

This document sets out the position of the trust in relation to its use of CCTV.

## Data Protection Principles

The Data Protection Officer for The Rivers Academy Trust is Fyonna Lammas [dpo@riverscofe.co.uk](mailto:dpo@riverscofe.co.uk).

The Trust will comply with the data protection principles. In accordance with Article 5(1) of the UK GDPR, the Trust will ensure that all personal data obtained through CCTV is:

- Processed lawfully, fairly, and in a transparent manner;
- Collected only for specified, explicit, and legitimate purposes;
- Adequate, relevant, and limited to what is necessary;
- Accurate and, where necessary, kept up to date (including ensuring time/date stamps are correct);
- Retained for no longer than is necessary;
- Processed in a manner that ensures appropriate security;
- Processed under the Trust's accountability obligations.

## Purpose of CCTV

The Trust permits use of CCTV for the following purposes:

- To provide a safe and secure environment for pupils, staff and visitors
- To prevent the loss of or damage to the trust/school buildings and/or assets
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

## Lawful Basis

The Trust has identified its lawful basis for processing CCTV footage under Article 6(1)(e) and Article 6(1)(f) of the UK GDPR. The legitimate interests pursued are the safety and security of pupils, staff, and visitors, and the protection of Trust property.

CCTV cameras may incidentally capture special category personal data, such as information revealing racial or ethnic origin, or data concerning a person's health or disability. Where CCTV footage captures special category data, the Trust relies on Article 9(2)(g) of the UK GDPR and Schedule 1, Part 2, Paragraph 6 of the Data Protection Act 2018. This is necessary to meet the Trust's safeguarding and public safety obligations.

## Description of System

Details of the CCTV installed at Unity Academy are Hikvision cameras

## Siting of Cameras

All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.

Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The school will make all reasonable efforts to ensure that areas outside of the school premises are not recorded.

Cameras will not be sited in areas where individual have a heightened expectation of privacy, such as changing rooms or toilets.

Signs will be erected to inform individuals that they are in an area within which CCTV is in operation. Each sign will clearly state:

- that CCTV is in operation;
- the name of the organisation operating the system;
- the primary purposes of the CCTV (e.g., to ensure the safety and security of pupils, staff, visitors, and property, and for the prevention and detection of crime);
- contact details or a link/QR code directing individuals to the school's full CCTV privacy notice.

## Data Protection Impact Assessment (DPIA)

Prior to the installation of any CCTV camera, or system, a Data Protection Impact Assessment (DPIA) will be completed by Unity Academy to ensure that the proposed installation is compliant with legislation and ICO guidance.

Unity Academy will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

## Management and Access

The CCTV system will be managed by the School Business Manager.

On a day to day basis the CCTV system will be operated by the office staff.

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The viewing of live CCTV images will be restricted to the School Business Manager, Office Administrator, Headteacher, Deputy Headteacher and Assistant Headteacher, the central team the trust Data Protection Officer (DPO). Special approval will be granted on a case by case basis as agreed by the Headteacher.

Recorded images which are stored by the CCTV system will be restricted to access by School Business Manager, Senior Leadership Team, office team and the trust Data Protection Officer (DPO) and other members of the central team.

CCTV images may also be viewed by our IT service provider, Joskos, or by other companies providing service and maintenance to the system.

Any third-party service providers who process CCTV data on behalf of the Trust will do so under a written Data Processing Agreement in line with Article 28 of the UK GDPR.

No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.

The CCTV system is checked by A&E Fire and Security to ensure that it is operating effectively.

## Storage and Retention of Images

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

Recorded images are stored only for a period of 22 days unless there is a specific purpose for which they are retained for a longer period. Images are automatically deleted after 22 days.

The trust/school will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

- CCTV recording systems being located in restricted access areas;
- The CCTV system being encrypted/password protected;
- Restriction of the ability to make copies to specified members of staff

Security measures will be reviewed, including password updates, access rights checks, and functionality testing. Where the system is capable of remote access, secure connection methods such as Virtual Private Networks (VPN) and multi-factor authentication (MFA) will be used. No portable copies of CCTV footage are held. If in future portable copies are required (e.g., for evidential purposes), these will be encrypted and securely deleted after use.

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by Unity Academy.

## Disclosure of Images to Data Subjects

Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.

Requests for CCTV footage will be handled in accordance with the Trust's Subject Access Request Policy. The Trust will respond to such requests within one calendar month from receipt, pausing the statutory deadline where clarification is sought in line with the Data (Use and Access) Act 2025.

Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the trust's/school's Subject Access Request Policy.

When such a request is made the individuals with access to CCTV, as set out in this document, will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The CCTV manager, as set out in this document, must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals then the trust/school must consider whether:

- The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
- The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
- If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

A record must be kept, and held securely, of all disclosures which sets out:

- When the request was made;
- The process followed by individuals with access to CCTV, as set out in this document, in determining whether the images contained third parties;
- The considerations as to whether to allow access to those images;
- The individuals that were permitted to view the images and when; and
- Whether a copy of the images was provided, and if so to whom, when and in what format.

## Disclosure of Images to Third Parties

Unity Academy will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

If a request is received from a law enforcement agency for disclosure of CCTV images then the individuals with access to CCTV, as set out in this document, must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

The information above must be recorded in relation to any disclosure.

If an order is granted by a court for disclosure of CCTV images then this should be complied with. However, very careful consideration must be given to exactly what the court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

## Review of Principles and Procedures and CCTV System

This Principles and Procedures document will be reviewed annually.

The CCTV system and the privacy impact assessment relating to it will be reviewed annually.

## Misuse of CCTV systems

The misuse of CCTV system could constitute a criminal offence.

Any member of staff who breaches this policy may be subject to disciplinary action.

## Complaints relating to this document

Any complaints relating to this document or to the CCTV system operated by Unity Academy should be made in accordance with the trust's Complaints Policy.

## Version Control

Date	Section	Summary of Change
August 2025	Data Protection Principles	New section added
August 2025	Lawful Basis	New section added.
August 2025	Siting of Cameras	Section added about signage.
August 2025	Management and Access	Added: Any third-party service providers who process CCTV data on behalf of the Trust will do so under a written Data Processing Agreement in line with Article 28 of the UK GDPR.
August 2025	Storage and Retention of Images	Security measures added.
August 2025	Disclosure of Images to Data Subjects	Requests for CCTV footage are handled in accorded with Subject Access Request Procedure.