North West Academies Trust
CCTV Policy

This policy was approved by the Trustees on 28th September 2026

Nayland Southorn **Chair of Trustees**

Adopted by school on 1st October 2026

This policy will be reviewed Annually on or before October 2027 if there are any statutory or guidance changes to be considered.

CCTV POLICY

1 Policy Statement

1.1 The North West Academies Trust uses Close Circuit Television ("CCTV") within the premises of The Rudheath Senior Academy. The purpose of this policy is to set out the position of the Trust as to the management, operation and use of the CCTV at the Trust schools.

1.2 This policy applies to all members of our workforce, visitors to the Trust School premises and all other persons whose images may be captured by the CCTV system.

1.3 This policy takes account of all applicable legislation and guidance, including but not limited to the following:

1.3.1 UK General Data Protection Regulation ("GDPR")

1.3.2 Data Protection Act 2018

1.3.3 Surveillance Camera Code of Practice (2021)

1.3.4 Human Rights Act 1998

1.4 This policy sets out the position of the Trust in relation to its use of CCTV.

2 Purpose of CCTV

2.1 The North West Academies Trust uses CCTV for the following purposes:

2.1.1 To provide a safe and secure environment for pupils, staff and visitors.

2.1.2 To prevent the loss of or damage to the Trust buildings and/or assets.

2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.

2.1.4 Determine the cause of accidents.

2.1.5 Protect members of the Trust community from harm to themselves or to their property.

2.1.6 Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings.

2.2 The CCTV system will not be used to:

2.2.1 Encroach on an individual's right to privacy.

2.2.2 Monitor in spaces where there is a heightened expectation of privacy (e.g. changing rooms).

2.2.3 Follow particular individuals, unless there is an ongoing emergency incident occurring.

2.2.4 Pursue any other purposes other than the ones stated above.

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

3 Description of system - School Specific

3.1 The CCTV system consists of:

3.1.1 10 hard drive recording systems

3.1.2 133 internal and external cameras]

3.1.3 The cameras are of fixed position and do not pan or tilt, they are colour and do have a manually operated zoom capability. They do not record sound.

3.1.4 The hard drive operates on a 24 to 30 day rolling cycle (dependent on the recording device) and all data is over written every 24 to 30 days (dependent on the recording device).

4 Location of Cameras

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

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

4.3 Cameras are located in:

4.3.1 All classrooms

4.3.2 External perimeter (accessible by public)

4.3.3 Communal spaces (lunch hall, yard, quads)

4.3.4 Main reception and Shipbrook Road/Middlewich Road car parks

4.4 Signs will be erected to inform individuals that CCTV is in operation on the school site.

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

5 Roles and Responsibilities

5.1 Governing Body

5.1.1 The Governing Body has the ultimate responsibility for ensuring the CCTV system is operated within the parameters of this policy and that the relevant legislation is complied with.

5.2 Headteacher

5.2.1 The Headteacher will take responsibility for all day-to-day leadership and management of the CCTV system.

5.2.2 The Headteacher will ensure that guidance set out in this policy is followed by all staff.

5.2.3 The Headteacher will ensure all persons with authorisation to access the CCTV system has received proper training of the CCTV system and in data protection.

5.2.4 The Headteacher will decide, in consultation with the Data Protection Officer (DPO) whether to comply with disclosure of footage requests from third parties.

5.3 Data Protection Officer (DPO)

5.3.1 The DPO will deal with subject access requests in accordance with the UK GDPR, the Data Protection Act 2018 and the Trust's Data Protection Policy.

5.3.2 The DPO will act as a point of contact for communications from the Information Commissioner's Office.

5.3.3 The DPO will receive and consider requests for third-party access to CCTV footage.

5.3.4 The DPO will advise and assist the school in the management of the CCTV system in line with relevant legislation.

5.4 System Manager / IT

5.4.1 The System Manager will take care of the day-to-day maintenance and operation of the CCTV system.

5.4.2 The System Manager will check the system for faults and security flaws.

5.4.3 The System Manager will ensure that data and time stamps are accurate.

6 Operation of the CCTV system

6.1 The CCTV system will be operational 24 hours a day, 365 days a year.

6.2 The system is registered with Information Commissioner's Office.

6.3 Recordings will have date and time stamps. This will be checked by the System Manager termly and when the clocks change.

7 Storage of CCTV footage

7.1 Footage will normally be retained for 30 days, after which it will be overwritten automatically. Where a request for access to footage, an investigation or another lawful reason requires preservation, relevant footage will be securely retained for as long as necessary to address that purpose.

7.2 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.

8 Access to CCTV footage – school specific information

8.1 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.

8.2 Requests for CCTV footage to be reviewed must be submitted to and approved by the school's Headteacher, Deputy Headteachers and Safeguarding Leads. Any individuals that access the footage must record their name, the date and time, and the reason for access in the access log.

8.3 Any visual display monitors will be positioned so only authorised personnel will be able to see the footage.

8.4 Recorded images which are stored by the CCTV system will be restricted to access by the Senior Leadership Team and is password protected.

8.5 The following members of staff have authorisation to access the CCTV footage:

8.5.1 Headteacher: Mrs Christine Williams

8.5.2 Deputy Headteacher(s): Mr Dafydd Jones, Mrs Jemma Morrell, Mrs Rebecca Rive

8.5.3 Assistant Headteacher: Mr Sam Naylor

8.5.4 Children's Advocate: Ms Edie Jardine

8.5.5 Director of Secondary: Mr David Lancaster

8.5.6 Business Manager: Mr Jack Jevons

8.5.7 Data Protection Officer: Mr Steve Docking OBE

8.5.8 System Manager: Universal Technologies Ltd – Mr Robert Olejnik, Mr Christopher Rutter

8.5.9 Anyone with express permission of the CEO or Headteacher.

8.6 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.

8.7 CCTV footage will only be accessed from authorised personnel's work devices, or from the visual display monitors.

8.8 Any member of staff who misuses the surveillance system may be committing a criminal offence, and will face disciplinary action.

9 Subject Access Request (SAR)

9.1 CCTV footage is collected and retained primarily for safeguarding, security, preventing and investigating incidents, and protecting pupils, staff and visitors. It is not the Trust's normal practice to provide copies of CCTV footage in response to Subject Access Requests (SARs).

9.2 The Trust recognises that individuals have rights of access to their personal data under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Requests relating to CCTV footage will be considered individually in accordance with the Trust's Data Protection Policy and applicable legislation.

9.3 CCTV footage frequently contains images of other pupils, staff, parents or visitors. The Trust will protect the personal data, privacy and safeguarding interests of these individuals. Recordings will not ordinarily be released where doing so would disclose information relating to identifiable third parties, unless disclosure is lawful and appropriate safeguards can be applied.

9.4 Where a SAR relates to CCTV footage, the Trust will consider whether the requester's personal data can be provided in another appropriate form, including redacted images, still photographs or a suitably edited extract, where necessary to comply with its legal obligations. The Trust is not required to provide unrestricted access to complete recordings.

9.5 All requests for CCTV footage must be referred promptly to the Trust's Data Protection Officer (DPO). Individuals may be asked to provide reasonable details, including the date, approximate time and location of the recording, to assist in identifying relevant footage. Relevant footage must be preserved while the request is assessed.

9.6 The DPO will consider each request, including the rights and freedoms of other individuals, relevant safeguarding considerations, applicable exemptions and whether disclosure would prejudice an investigation where a statutory exemption applies. Disclosure may be withheld or restricted only where permitted by law.

9.7 Where CCTV footage cannot lawfully be disclosed, the Trust will explain its decision and the reasons for any restriction, subject to applicable legal limitations. The Trust will respond to the SAR within statutory timescales.

9.8 Any information disclosed in response to a SAR will be provided securely. The Trust will maintain an appropriate record of the request, the decision reached, any information disclosed and the reasons for that decision.

9.9 Individuals wishing to understand their rights or raise concerns about the handling of a SAR may refer to the Information Commissioner's Office (ICO) website.

10 Third Party Access

10.1 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).

10.2 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).

10.3 All requests for access should be set out in writing and sent to the headteacher and the DPO.

10.4 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 DPO will consider very carefully how much footage to disclose, and seek legal advice if necessary.

10.5 The DPO will ensure that any disclosures that are made are done in compliance with UK GDPR.

10.6 All disclosures will be recorded by the DPO.

11 Security

11.1 The System Manager will be responsible for overseeing the security of the CCTV system and footage.

11.2 The system will be checked for faults once per term.

11.3 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.

11.4 Footage will be stored securely and encrypted wherever possible.

11.5 Cyber security measures will be put in place to protect the footage from cyber attacks.

11.6 The System Manager will review any software updates published by the equipment's manufacturer and apply them as soon as possible.

12 Review of Policy

12.1 This policy will be reviewed annually.

13 Complaints relating to this policy

13.1 Any complaints relating to this policy or to the CCTV system operated by the Academy should be made in accordance with the Academy Complaints Policy.