



1.1. Windsor Academy Trust (WAT) recognises that CCTV and sound recording systems can be a key tool in ensuring the effective safeguarding and security of school premises and the staff and students within. The use of such equipment helps to maintain the safety of all users as well as the premises themselves. Equally, WAT understands that CCTV and audio recording can be privacy intrusive.

For this reason, the school has carried out a data protection impact assessment with a view to evaluating whether the CCTV system in place is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the data protection impact assessment has informed the school's use of CCTV and the contents of this policy.

2.1. Review of this policy shall be repeated regularly and may be updated when new equipment is introduced and as Code of Practice changes. Where a review is carried out review of the associated risk assessment will be completed. We aim to conduct reviews no later than every two years.

The legal basis of this policy and the use of CCTV and sound recording systems is to perform a public task through our educational establishments. The purpose of this policy and the associated CCTV and sound recording systems is to assist WAT and its schools in reaching the following objectives:

- a. To ensure the public purpose of keeping children safe and well educated
- b. To protect pupils/students, staff and visitors against harm to their person and/or property;
- c. To increase a sense of personal safety and reduce the fear of crime;
- d. To protect the trust schools, office buildings and assets;
- e. To support the police in preventing and detecting crime;
- f. To assist in identifying,





- 3.3. CCTV cameras and sound recording systems are not installed in areas in which individuals would have an expectation of privacy such as toilets, changing facilities, etc.

CCTV cameras are installed in such a way that they are not hidden from view. Signs are predominantly displayed where relevant so that staff, students, visitors and members of the public are made aware that they are entering a school that is covered by CCTV. The signs also contain local contact details. The CCTV system will seek to comply with the requirements of both the Data Protection Act and the most recent Commissioner's Code of Practice.

- 4.1.1. WAT will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

- 4.1.2. The system has been designed so far as possible to deny observation on adjacent private homes, gardens and private premises.
The system has been designed so far as possible to deny observation on adjacent private homes, gardens and private premises.

4.1.9. Recorded images and sounds will only be retained long enough for any incident to come to light (e.g., for a theft to be noticed) and the incident to be investigated. In the absence of a compelling need to retain images and sounds for longer



- 5.9. Details of all visits and visitors will be recorded in a system log book including time/data of access and details of images viewed and the purpose for doing so.

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings), any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures:

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- 6.1.1. Each downloaded media must be identified

- 6.2. Images and/or sound recordings may be viewed by the police for the prevention and detection of crime and by the Systems Manager, their replacement and the Headteacher and other authorised senior leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable if possible, for that person to withhold viewing of the data until asked to do so by the police.
- 6.3. A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.
- 6.4. Should images and/or sound recordings be required as evidence, a copy may be released to the police under the procedures described in this policy. Images and/or sound recordings will only be released to the police on the clear understanding that the downloaded media (and any images and/or sound recordings contained thereon) remains the property of the school and downloaded media (and any images and/or sound recordings contained thereon) are to be treated in accordance with Data Protection legislation. WAT also retains the right to refuse permission for the police to pass the downloaded media (and any images and/or sound recordings contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media, this will be produced from the secure evidence store, complete in its sealed bag.
- 6.5. The police may require WAT to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until needed by the police.
- 6.6. Applications received from outside bodies (e.g., solicitors or parents) to view or release images and/or sound recordings will be referred to the school's Data Protection Lead and a decision made with the school's Data Protection Lead.

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