



# PROSPER TOGETHER MULTI SCHOOL TRUST

## CCTV POLICY AND PROCEDURE

**DATE**  
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**PREPARED BY**  
DPO

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**Prosper Together Multi School Trust (the 'Trust') refers to all the Trust member schools and the central team.**

# CCTV Policy and Procedures

## 1. Introduction

The purpose of these procedures is to provide assistance in the operation, management and regulation of the CCTV systems in place at the academies within Prosper Together Multi Academy Trust (the 'Trust').

This document is subordinate to our Data Protection Policy and operates within the context of that policy.

CCTV systems within the Trust are owned and operated as follows:

School	Owned By	Operated By
Castle Bromwich Junior School	The Trust	The school
Castle Bromwich Infant School	The Trust	The school
Fordbridge Community Primary School	The Trust	The school
Kingshurst Primary School	The Trust	The school
Windy Arbor Primary School	The Trust	The school

These procedures follow the ICO's Code of Practice for Surveillance Cameras and Personal Data, the Data Protection Act 2018 (UKGDPR), Data Use and Access Act 2025, the Freedom of Information Act 2000, the Equality Act 2010, the Regulation of Investigatory Power Act 2000, our Data Protection Policy and the Trust Privacy Notices.

We have considered the privacy issues involved with using surveillance systems and have concluded that their use is necessary and proportionate to the needs we have identified.

## 2. Objectives of the CCTV Scheme

In each school where CCTV systems are in operation, the scheme aims to:

- protect the Trust's buildings and assets, both during and after operating hours;
- allow the school to uphold its duties in relation to safeguarding;
- increase the personal safety of staff, pupils and visitors;
- reduce the risk of bullying;
- reduce the incidence of crime and anti-social behaviour;
- support the Police in efforts to deter and detect and investigate crime;
- assist in identifying, apprehending and prosecuting offenders;
- protect members of the public; and
- ensure other relevant policies can be operated in line with expected standards.

In line with those aims, any information captured by our CCTV systems is processed in performance of tasks carried out in the public interest. Any special category data is processed for reasons of substantial public interest.

The CCTV system is not intended for the following purposes, which are prohibited:

- covert surveillance, unless it is at the written request of a law enforcement agency with the appropriate authority;
- monitoring individuals based upon their protected characteristics as specified by the Equality Act 2010; or
- any other purpose which is not consistent with the stated aims.
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### 3. Roles and Responsibilities

#### *Prosper Together Multi Academy Trust*

Prosper Together MAT is the data controller for all data captured by its academies' CCTV systems. The Trust is responsible for:

- proposing, amending and maintaining these CCTV procedures, in consultation with appropriate stakeholders and within the limits of our Data Protection Policy and relevant legislation;
- maintaining Privacy Notices, which will include explicit references to the CCTV systems where appropriate;
- maintaining a Retention Schedule, which will include explicit references to information recorded by the CCTV systems; and
- providing operational advice and support to the academies on the administration of these procedures, and on data protection issues more generally.

#### *The Data Protection Officer (DPO)*

The DPO, who is named within our Data Protection Policy, is responsible for:

- independently monitoring compliance with these CCTV procedures;
- coordinating any data protection impact assessments, as appropriate;
- reporting any findings and recommendations to the Trust for consideration;
- providing operational and strategic advice and support on data protection issues
- investigating any suspected data breaches relating to the CCTV system; and
- coordinating responses to subject access requests and freedom of information requests relating to information captured by the CCTV system.

#### *Headteachers*

The Headteacher for each school is responsible for:

- day-to-day leadership on data protection issues within the school;
- ensuring routine performance monitoring, including random operating checks, takes place;
- supervising access to, and administration of, the CCTV system;
- ensuring staff receive appropriate and regular training on data protection;
- delegating operational duties within the school as appropriate; and
- appointing the System Operator (s).

#### *The System Operators*

The System Operator(s) for each school is responsible for:

- the day-to-day administration of the CCTV system, in accordance with these procedures;
- regulating access to CCTV control areas, by satisfying themselves about the identity of the visitor(s) and the purpose of the visit(s) before any access is permitted;
- ensuring CCTV control areas are kept secure;
- maintaining logs to record who exports footage from the system, and when;
- applying the retention policy to ensure information captured by the system is not stored longer than necessary.

In the event that a conflict of interest is identified, the Headteacher will nominate an alternative person to perform these duties on a case-by-case basis. These duties will be performed in accordance with our Data Protection Policy.

## 4. Operation of the System

The CCTV systems within the Trust are implemented as follows:

School	Number of Cameras	Internal	External	Controlled From/By
Castle Bromwich Junior School	25	YES	YES	Admin Office and DHT Office / SLT
Castle Bromwich Infant School	18	YES	YES	Rear Office / Business Manager and Site Manager
Fordbridge Community Primary School	TBC	YES	YES	IT Office / Site Manager
Kingshurst Primary School	16	YES	YES	SLT Office / SLT
Windy Arbor Primary School	38	YES	YES	Inclusion Office / IT Officer

These systems will be operated 24 hours per day for every day of the year.

The location of cameras is a key consideration in ensuring the CCTV scheme meets its objectives while minimising risks to individuals' privacy. Each school will consider the following criteria when selecting locations for any additional cameras for installation:

- Spaces that do not have relevance to the scheme's purposes will be avoided where possible. This consideration should be given particular weight for spaces which are not part of the school's premises (such as public pavements or neighbouring property).
- Cameras should be sited to ensure they can produce images of the right quality, taking into account their technical capabilities and the environment in which they are placed.
- Cameras should be suitable for the location, bearing in mind the light levels and the size of the area to be viewed by each camera.
- Cameras should be positioned so they produce images of a consistent quality throughout the year (such that they are not obscured by plant growth during spring, for example).
- Cameras should be sited so they are secure and protected from vandalism.

Unless an immediate response is required, staff must not direct cameras at an individual, their property, or a specific group of individuals without authorisation being obtained for directed surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.

## 5. Notification

Each school will notify individuals that CCTV is in use by installing and maintaining signage at entrances to the school's premises. Signage will:

- be clearly visible in the areas where CCTV is present
- text will be printed so it is legible;
- contain details of the organisation operating the system and who to contact about the scheme (where these things are not obvious to those being monitored);
- include basic contact details such as a simple website address, telephone number or email contact; and
- be an appropriate size depending on context such as whether they will be viewed by pedestrians or motorists.

The academies will provide a copy of these procedures, and the Privacy Notices, upon request.

## **6. Storage and Retention**

Information captured by the CCTV systems will not be kept for longer than is necessary and for a time period that is relevant to the purposes we have established. As a minimum, CCTV footage will be retained for a period of 30 calendar days.

Where clips, or footage has been saved or exported to support the management of specific incidents, or support a complaint relating to CCTV, the retention period will be directly associated for the purpose it has been identified as supporting.

Recorded material will be stored:

- in a way that maintains the integrity of the information; and
- in a secure environment with restricted access and which is locked when not occupied by authorised staff.

The Data Protection Officer, and staff at the Trust, are authorised to access the system and its recordings on a need-to-know basis. Other staff within the academies will be authorised by their Headteacher.

## **7. Disclosure**

Information captured by the CCTV systems is highly likely to constitute personal data, including special category data. Decisions to disclose this information externally may only be made by the Headteacher of the school or the Trust in consultation with the Data Protection Officer.

Requests will be considered on a case-by-case basis but such information may be disclosed to:

- the Police in order to support the detection and prevention of crime;
- the Health and Safety Executive, Local Authority, or any other statutory body charged with safeguarding children and young people in order to promote that safeguarding;
- individuals (or their authorised representatives) in response to a subject access request for their own personal data or where the requested information is subject to a court order; or
- the Trust or school's insurance provider, where the information is required to support a claim for damages done to the insured property.

Where information is requested by an external organisation, or an individual as an information rights request, this request should be made in writing. All requests will be reported to the DPO and logged by the System Operator.

In many cases, where the personal data of multiple individuals is captured, the school, in consultation with the Data Protection Officer will be responsible for determining whether the disclosure of CCTV footage as part of an information rights request is reasonable.

All CCTV systems used by the Trust do not currently support the redaction of live or exported raw footage.

The Data Protection Officer will consider whether disclosure of footage can be achieved in a manner that protects the rights and privacy of other individuals whose personal data may be contained in any clip/section of footage. Where disclosure of live/raw footage is not possible, the school must consider whether the disclosure of still images taken from footage will allow an information rights request to be upheld.

## **8. Training**

All staff will be entitled to receive general training on data protection. System Operators will require additional training before they are permitted access to the CCTV system. That will include:

- how to implement these procedures;
- that they are subject to a confidentiality duty and that it is a criminal offence to misuse surveillance system information;
- how to apply the arrangements set out in the Retention Schedule as they relate to information captured by the CCTV system;
- how to handle information securely;
- how to recognise both a subject access request and a freedom of information request, and what to do if such a request is received; and
- what to do if they receive a request for information from an official authority, such as the Police.

## 9. Monitoring and Review

The Headteacher for each school will arrange for routine performance monitoring, including random operating checks. Such checks will consider, for example, whether:

- access restrictions are implemented appropriately and logs are kept up-to-date;
- signage is adequate; and
- recordings are disposed of in line with the Retention Schedule.

Additionally, independent monitoring may be carried out by the Data Protection Officer and/or the Trust. Such monitoring may take the form of a routine operating check, as above, but will also focus wider questions including whether:

- the system is addressing the needs and delivering the benefits that justify its use;
- the scheme complies with relevant legislation and codes of practice; and
- the technical, physical and organisational measures used are appropriate.

## 10. Complaints

Complaints relating to the operation of CCTV will be dealt with in accordance with the Trust's Complaints Policy: [Policy Link](#)

If you have a complaint about how your personal data has been handled by, you should contact the Data Protection Officer in the first instance. You can do this by emailing: [DPO@ptmat.org](mailto:DPO@ptmat.org)

The Data Protection Officer will conduct an internal review and respond to you within a calendar month.

If you are unsatisfied with the response the Trust has provided, you have the right to contact the Information Commissioner's Office. You can do this online at:

<https://ico.org.uk/make-a-complaint/data-protection-complaints/>

## 11. Last Update

This policy was last updated in December 2025