

Use of Closed-Circuit Television (CCTV) in DEMAT Academies

Policy type	Business management (non-statutory)
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Last updated	August 2022
Reviewed	Adrian Ball
Approved by	Adrian Ball
Release date	July 2025
Review cycle	EVERY TWO YEARS Policies will be reviewed in line with DEMAT's internal policy schedule and/or updated when new legislation comes into force
Description of changes	Reformatting and minor changes

Application of this Procedure

This policy applies to all academies in DEMAT that have CCTV in place on academy premises.

CCTV use procedure

Where an academy use CCTV, the system and the images produced by it are controlled by the academy and the academy is responsible for how the system is used. DEMAT has ensured that its data protection registration with the Information Commissioner's Office identifies that it uses CCTV system to capture Personal Data.

The academy has considered the need for using CCTV and have decided it is required for the prevention and detection of crime, and for protecting the safety of its pupils, employees, volunteers and visitors. It will not be used for other purposes.

The privacy related issues related to the use of CCTV must be clearly identified by the academy, including the rationale as to why installing cameras is considered the best solution. A record of this position is held by the academy.

All academies with CCTV conduct an annual review of their use of CCTV. In addition, academies are required annually to assess whether they have a need for CCTV. These reviews are captured on Safesmart.

The headteacher is responsible for the operation of the system but may delegate the day-to-day running of it to a designated person (e.g. School Office or Site Manager).

A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime, and these can easily be taken from the system when required. Cameras have been sited so that they provide clear images. Cameras have been positioned to avoid capturing the images of persons not visiting the premises.

There are visible signs showing that CCTV is in operation and contact details for the person responsible for the system. Images from the CCTV system are securely stored, where only a limited number of authorised persons have access to them, including the headteacher and the DEMAT Data Protection Officer (DPO).

The recorded images will only be retained long enough for any incident to become known (e.g. for a theft to be noticed) and the incident to be investigated. Except for law enforcement bodies and requests from applicable data subjects, images will not be provided to third parties.

The potential impact on individuals' privacy has been identified and taken into account in the use of the system.

Where academies receive requests from individual for copies of their own images, the Data Protection Officer must be notified.

Where copies of CCTV footage have been requested by individuals as part of subject access requests, they must be reviewed prior to release and all images of other people on that footage must be redacted. Where it is not possible to redact those images, the school must issue only a written summary of what the footage shows.

Regular checks are conducted to ensure that the system is working properly and produces high quality images. The person with day-to-day delegated duties is responsible for ensuring that the checklist overleaf is completed monthly and a record kept on the Safesmart reporting system, adhering to the DEMAT Retention Guidelines. A copy of reporting checklist is attached at Appendix 1.

Associated Policies and Documents

This Policy/Procedure should be read in conjunction with the following DEMAT Policies/Procedures:

DEMAT Data Protection Policy

Version control

No.	Status of document/changes	Prepared by	Reviewed by	Approved by	Date of approval
1.	Baseline policy introduced	Data Protection Officer		Standards and Ethos Committee	September 2018
2.	Updated with new format	Head of Governance	Data Protection Officer	N/A	August 2022
3.	Updated	Data Protection Officer		CEO	July 2025

The document was reviewed in June 2020 and January 2024 with no changes being required.

This document will be reviewed every two academic years. The document will be next to be reviewed for implementation in May 2027.

For all questions in relation to this procedure, please contact dpo@demat.org.uk

Appendix 1

CCTV checklist

Date of check:	
Name of person:	
Signature:	
Date forwarded to DPO at Trust:	

	Enter Yes or No	Narrative where required
Confirm that there are visible signs showing that CCTV is in operation and contact details for the person responsible for the system?		
Confirm that the system is working properly and images are clear?		
Confirm that Cameras are not capturing images of persons not visiting the premises?		
Are Images from the CCTV system securely stored, and a limited number of authorised persons have access to them?		
Confirm recorded images have been deleted since last month as no incidents reported?		
Have any Incidents been reported to the DPO at the Trust during the last month?		

Have any recorded images been passed to law enforcement bodies since last month? If so, please provide details.		
Have images been given to any third party (other than law enforcement bodies) since last month? If so, please provide details		
Are there any changes to the CCTV system since last month? If so, update the DPO at the Trust (to enable the ICO to be informed).		
Is there any other information outside of the above to be notified to DPO?		