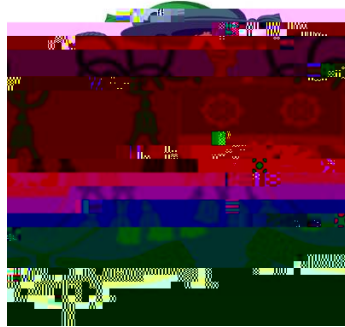




# The Bishop Wheeler Catholic Academy Trust



## Our Mission

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Outstanding Catholic education for all pupils. As a family of schools, we will enable our young people to develop spiritually, morally, intellectually and personally, putting their faith into action, through serving Christ in others, in the church and in the world around them.

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This policy was approved by the Chief Executive Officer on behalf of the Trust Board

Signature:

A handwritten signature in black ink, appearing to read 'D Beardsley', enclosed within a large, stylized oval shape.

Mr D Beardsley  
Chief Executive Officer

Date: 4<sup>th</sup> September 2023

Version		2.0	
Date		04/09/23	
Approved by CEO		04/09/23	
Version	Date	Description	Revision Author/s
1.0 Published	June 2020	Trust Policy	JJN/DBY/GNE/NFR/Schofield Sweeny Solicitors
2.0 Review	September 2023	Trust Policy Review	JJN/DBY/GNE/NFR

### Change review

Version	Date	Changes
1.0	June 2018	New Policy
2.0	September 2023	Introduction - updated Purpose - updated Relevant legislation and guidance - Information added Roles and Responsibilities - updated DPO details - information added Operation of the CCTV System - information added Storage and Retention - updated Subject Access Request - updated Monitoring of this policy CCTV System



## Definitions

In this policy for CCTV, unless the context otherwise requires, the following expressions shall have the following meanings:

BWCAT	The Bishop Wheeler Catholic Academy Trust.
Trust, we and our	Covers all of the schools within The Bishop Wheeler Catholic Academy Trust and The Bishop Wheeler Catholic Academy Trust Office.
Governing Body	The Directors of the Trust Board.
Academy Council	Governors elected or appointed to individual Academy Councils.
CEO	The Chief Executive Officer for the Trust.
Executive Headteacher/Headteacher	Executive Headteacher/Headteacher responsible for individual academies.
DPO	Data Protection Officer
ICO	Information Commissioner's Office



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

Footage or any information gleaned through the CCTV system will never be used for commercial purposes.

In the unlikely event that the police request that CCTV footage be released to the media, the request will only be complied with when written authority has been provided by the police, and only to assist in the investigation of a specific crime.

The footage generated by the system should be of good enough quality to be of use to the police or the court in identifying suspects.

## Relevant legislation and guidance

policy or its operation, and any proposals for development, through the appropriate



Data Protection Officer (DPO)

The Data Protection Officer is:

Jemma Johnson

Trust Head of Governance

[j.johnson@bwcat.org](mailto:j.johnson@bwcat.org)

The role and responsibilities of the DPO include:

Dealing with subject access requests (SAR) in line with legislation, for any disclosure of CCTV footage held by the Trust.

Ensuring that all identified staff at each academy within the Trust handle and process surveillance and CCTV footage in accordance with data protection legislation.

Ensuring that surveillance and CCTV footage is obtained in line with legal requirements.

Ensuring that surveillance and CCTV footage is destroyed in line with legal requirements when it falls outside of its retention period.

Informing data subjects of how their data captured in surveillance and CCTV footage will be used by the academy, their rights for the data to be destroyed and the measures implemented by the academy to protect individuals' personal information.

Ensuring each academy in the Trust has completed a privacy impact assessment (PIA), and a data protection impact assessment (DPIA), to ensure the use of surveillance and CCTV is justified and monitors the risks of using such systems.

Train all identified staff in the Trust to understand their responsibilities as set out in the ICO CCTV Codes of Practice and to be able to identify any Subject Access Request.

Act as a point of contact for communications from the Information Commissioner's Office.

Ensure that the CCTV system is not infringing on any individual's reasonable right to privacy in public spaces.

Receive and consider requests for third-party access to CCTV footage.

## Siting of Cameras

Cameras will be sited so they only capture images relevant to the purposes for which they are installed (as described in the introduction above) and care will be taken to ensure that reasonable privacy expectations are not violated. Each academy will ensure that the location of equipment is carefully considered to ensure that images captured comply with the GDPR.

Each academy will make every effort to position cameras so that their coverage is restricted to the academy premises and minimise the recording of passer-by or of another person's private property.

The cameras will be sited to ensure that they can produce images of the right quality, taking into account their technical capabilities and the environment in which they are placed.

CCTV will only be sited in classrooms if there is a clear reason to do so, such as damage to equipment or the building. This must be discussed with the Headteacher and DPO prior to the installation of any camera.

CCTV cameras will not be placed in toilets or changing rooms, to protect privacy. Signs will be displayed to inform individuals that they are in an area within which CCTV is in operation.

## Data Protection Impact Assessments (DPIA)

A Data Protection Impact Assessment (DPIA) will be completed whenever the development or review of a CCTV system is being considered. This is to ensure that the purpose of the system is and remains justifiable.

A DPIA will be reviewed prior to the installation of any additional surveillance and CCTV



## Storage and Retention

Recorded images will be kept for no longer than 30 days. On occasion footage may be retained for longer than 30 days for a specific and exceptional reason, 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.

While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.



## Links to other policies

[Data protection policy](#)

[Privacy notices for parents, pupils, staff, governors and volunteers](#)

[Safeguarding policy](#)



The 13 schools in our Trust:

St. Mary's Menston, a Catholic Voluntary Academy

St. Joseph's Catholic Primary School Otley, a Voluntary Academy

Ss Peter and Paul Catholic Primary School, a Voluntary Academy

Sacred Heart Catholic Primary School Ilkley, a Voluntary Academy

St Mary's Horsforth Catholic Voluntary Academy

St. Joseph's Catholic Primary School Pudsey, a Voluntary Academy

St Joseph's Catholic Primary School Harrogate, a Voluntary Academy

St Mary's Catholic Primary School Knaresborough, a Voluntary Academy

St. Stephen's Catholic Primary School and Nursery, a Voluntary Academy

Holy Name Catholic Voluntary Academy

St Roberts Catholic Primary School, a Voluntary Academy

St John Fisher Catholic High School Harrogate, a Voluntary Academy

St Joseph's Catholic Primary School Tadcaster, a Voluntary Academy



## The Bishop Wheeler Catholic Academy Trust

The Bishop Wheeler Catholic Academy Trust is a charity and a company limited by Guarantee, registered in England and Wales.

Company Number: 8399801

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Chair of the Trust Board: Mrs Diane Gaskin