

## **CCTV Policy**

| Key Information                      |                           |
|--------------------------------------|---------------------------|
| Policy                               | CCTV Policy               |
| Policy Lead                          | JB                        |
| Last Reviewed                        | July 2026                 |
| Approved by Principal/Governing Body | July 2026                 |
| New Review                           | July 2027                 |
| Filing Classification                | Health Safety and Estates |

## 1. Policy Statement

Xaverian College operates a Closed-Circuit Television (CCTV) system across its premises for the primary purpose of ensuring the safety and security of all students, staff, visitors, and college property. This policy outlines the college's commitment to using CCTV lawfully, ethically, and in a manner that respects individual privacy, in compliance with the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, the Human Rights Act 1998, and the Information Commissioner's Office (ICO) CCTV Code of Practice.

## 2. Purpose of CCTV

The CCTV system at Xaverian is installed and operated for the following objectives:

- To deter crime, anti-social behaviour, and misconduct.
- To assist in the detection, investigation, and prosecution of criminal offences committed on college property.
- To provide evidence for internal disciplinary proceedings involving students or staff, where appropriate.
- To monitor and ensure the security of college buildings, assets, and grounds.
- To assist in the prevention and detection of health and safety incidents.
- To support emergency services in responding to incidents.

## 3. Scope

This policy applies to all CCTV systems operated by the college, including fixed cameras, dome cameras, and any other systems that capture images of identifiable individuals. It covers all individuals on college property, including students, staff, visitors, and contractors.

## 4. Data Protection Principles

As images of identifiable individuals constitute personal data, Xaverian college is committed to adhering to the following data protection principles:

- **Lawfulness, Fairness, and Transparency:** CCTV is used for legitimate and clearly defined purposes, with appropriate signage informing individuals of its presence.
- **Purpose Limitation:** Images are collected only for the purposes stated in this policy and will not be used for any other purpose.
- **Data Minimisation:** No more images or information will be collected or stored than is necessary for the stated purposes. Cameras are positioned to minimise intrusion into areas where there is a reasonable expectation of privacy (e.g., inside changing rooms, lavatories and private offices).

- **Accuracy:** Reasonable steps will be taken to ensure the accuracy of recorded images.
- **Storage Limitation:** Images will be retained for no longer than is necessary to achieve the purposes for which they were collected. Typically, footage will be retained for a maximum of 30 days, unless it is required for an ongoing investigation, legal proceedings, or legitimate evidential purposes.
- **Integrity and Confidentiality:** Appropriate security measures are in place to protect CCTV footage against unauthorised access, alteration, disclosure, or destruction.

## 5. Placement of Cameras

Cameras are strategically placed in areas identified through a risk assessment as requiring surveillance to achieve the stated purposes. These areas may include:

- Building entrances and exits
- Corridors and communal areas
- Car parks and external perimeters
- Reception areas
- High-value asset storage areas

Cameras are not, and will not be, deliberately aimed at areas where individuals have a reasonable expectation of privacy, such as toilets, changing rooms, or private staff offices (unless covert surveillance is authorised under exceptional circumstances as per point 9).

## 6. Signage

Clear and prominent signage will be displayed at the entrances to, and within, areas covered by CCTV. This signage will:

- Inform individuals that CCTV is in operation.
- State the purpose of the CCTV system.
- Identify Xavierian college as the operator of the system and the Data Controller.
- Provide contact details for further information or subject access requests.

## 7. Access to and Disclosure of Footage

- Access to live and recorded CCTV footage is strictly limited to authorised personnel (see Appendix A) who have received appropriate training on data protection and the proper use of the system.
- Footage will only be disclosed to third parties in accordance with legal requirements (e.g., to law enforcement agencies for the prevention or detection of crime, or in response to a court order). All such disclosures will be documented by the Data Protection Officer.

- Where footage is used in disciplinary proceedings, individuals concerned will be informed and given the opportunity to view the relevant footage, subject to safeguarding the privacy of other individuals in the footage.

## 8. Subject Access Requests (SARs)

Individuals have the right to request access to personal data held about them, including CCTV footage, under the UK GDPR. Subject Access Requests should be made in writing to the College's Data Protection Officer. To facilitate the request, individuals should provide sufficient detail, including the date, time, and specific location, to enable the college to identify the relevant footage. The college will respond to SARs within one month of receipt. Where footage includes third parties, their images may be obscured to protect their privacy.

## 9. Responsibilities

- **College Principal and Board of Governors:** Overall responsibility for ensuring the CCTV system operates within the parameters of this policy and complies with relevant legislation.
- **Facilities Manager and IT Manager:** Day-to-day management, operation, and maintenance of the CCTV system.
- **Data Protection Officer (DPO):** Responsible for ensuring compliance with data protection legislation and handling Subject Access Requests related to CCTV footage.
- **All Staff:** Are expected to adhere to this policy and report any concerns regarding CCTV operation or misuse.

## 10. Review

This policy will be reviewed annually, or sooner if there are changes in legislation, guidance from the ICO, or significant changes to the college's CCTV system.

## 11. Further Information

For any queries regarding this CCTV Policy, please contact the College's Data Protection Officer Ivan Lewis at [i.lewis@xaverian.ac.uk](mailto:i.lewis@xaverian.ac.uk)

## 12. Appendix A

Personnel authorised to view CCTV images are as follows:

- Principal
- Director of Finance and Operations
- Vice Principals
- Facilities Managers
- Facilities and security staff

- IT Managers
- Designated Safeguarding Leads

Where other staff members require access to the CCTV footage this can only be approved by one of the above individuals and will be strictly time limited. Access will be removed upon completion of the access requirements.