



CCTV Data Protection Impact Assessment (DPIA)

1. Introduction

This CCTV Data Protection Impact Assessment (DPIA) relates to the use of CCTV systems by Sharpe Academy of Theatre Arts Limited (“Sharpe Academy”, “the Academy”, “we”, “us”, “our”).

CCTV is used to support the safety and security of students, staff, visitors and property. Given that the Academy works extensively with children and young people, particular care is taken to ensure that CCTV is used appropriately and proportionately.

2. Description of Processing

2.1 What data is collected

- Video recordings of individuals on the premises
- Date and time of recordings
- Location of cameras

2.2 How data is collected

- Fixed CCTV cameras located in key areas of the premises

Cameras are positioned to monitor:

- Entrances and exits
- Communal areas

Cameras are not installed in:

- Toilets
- Changing areas
- Private spaces

2.3 How data is stored

- CCTV recordings are stored securely on a local system
- Access is restricted to authorised personnel only

2.4 Data retention

- Recordings are retained for approximately 30 days
- Footage may be retained for longer where required for investigation or legal purposes

2.5 CCTV Camera Register

The Academy maintains an internal CCTV Camera Register which records the location, coverage and function of each camera.

This register is used to ensure that camera placement and use remain appropriate, proportionate and aligned with the purposes set out in this DPIA.

The register is reviewed periodically and updated where changes are made to the CCTV system.

3. Purpose and Lawful Basis

3.1 Purpose

CCTV is used to:

- Safeguard students, particularly children and young people
- Protect staff and visitors
- Deter and detect inappropriate behaviour
- Support the investigation of incidents
- The system uses video-only recording to minimise intrusion

3.2 Lawful basis

Processing is carried out under legitimate interests, specifically:

- Ensuring the safety and wellbeing of students, staff and visitors
- Protecting property and facilities
- Supporting safeguarding responsibilities

The use of CCTV is considered necessary and proportionate for these purposes.

4. Necessity and Proportionality

CCTV is used only where necessary to achieve the purposes outlined above.

The system is designed to be proportionate by:

- Limiting coverage to relevant areas only
- Avoiding private or sensitive spaces
- Restricting access to recordings
- Retaining footage for a limited period

Clear signage is in place to inform individuals that CCTV is in operation.

5. Risk Assessment

The following risks have been identified:

5.1 Unauthorised access to CCTV footage

Risk of footage being viewed by unauthorised individuals

5.2 Misuse of CCTV data

Risk of footage being used for purposes other than those intended

5.3 Excessive or inappropriate monitoring

Risk that CCTV could be perceived as intrusive if not properly controlled

6. Measures to Reduce Risk

To mitigate these risks, the Academy implements the following measures:

- Access to CCTV footage is restricted to authorised personnel only
- Footage is only accessed when necessary for legitimate purposes
- Cameras are positioned to avoid private areas
- Clear signage informs individuals of CCTV use
- Footage is retained only for a limited period
- The system is used solely for safety and security purposes

7. Consultation and Review

This DPIA is reviewed regularly to ensure continued compliance and proportionality.

The Academy will:

- Review camera positioning where necessary
- Ensure continued justification for CCTV use
- Update this DPIA in line with operational or legal changes