PINEWOOD

Est. 1875

CCTV POLICY

A Whole-School policy including the EYFS

Introduction

1. The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Pinewood. It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the School and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the System).

2. The System is administered and managed by the School, who acts as the Data Controller. This policy will be subject to review from time to time, and should be read with reference to the Privacy Notice for the Whole School Community. For further guidance, please review the Information Commissioner's CCTV code of practice https://ico.org.uk/for-organisations/advice-for-small-organisations/cctv-and-dashcams/cctv-for-your-organisation-things-you-need-to-do/.

3. All fixed cameras are in plain sight on the School premises and the School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds.

Locations

4. The system will comprise 11 cameras sited at the following locations:

- Corner of the Science Block overseeing the drive;
- Science Block facing entrance to Pre-Prep overseeing the front of Pre-Prep and exit gate;
- Path at side of Pre-Prep overseeing pedestrian gates;
- Sports Hall overseeing the All Weather Pitch road and car park;
- Corner of the Estates Building overseeing the gate and car park;
- Estates Gate overseeing Potlid Lane.
- Entrance to The Hoyland (Teaching and Learning Centre) overseeing the Changing Rooms and Lower School);
- Corner of The Hoyland (Teaching and Learning Centre) overseeing entrances to Hoyland.
- The Lodge overseeing the front gate.
- Lower School overseeing the driveway towards the Public Footpath.
- Lower School overseeing the driveway towards Main House.

Purpose

5. The School's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the School believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- To monitor the security and integrity of the School site and deliveries and arrivals.
- To monitor cases of unacceptable pupil behaviour.

Positioning

6. Locations have been selected that the School reasonably believes require monitoring to address the stated objectives. Adequate signage will be maintained in prominent positions to inform pupils, staff, volunteers, visitors and members of the public that they are entering a monitored area.

7. No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities. No images of public spaces will be captured except to a limited extent at site entrances.

Maintenance

8. The CCTV System will be operational 24 hours a day, every day of the year.

9. The day-to-day management of images will be the responsibility of the Estates Manager who will act as the System Manager, in conjunction, with the IT Network Manager.

10. The System Manager will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.

Supervision of the System

11. Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons. Authorisation to review the images will be granted by the Bursar as detailed below under 'Access to Images'.

12. Access to the CCTV footage will be made available on the Caretaker's school mobile phone by App for the purpose of accessing it should there be any security concerns during out of hours.

The footage from the CCTV on the Estates Building is to be viewed should the alarm in the Estates Building be sounded so that relevant action can be taken.

Storage of Data

13. Images will be stored for 28 days, and automatically overwritten unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.

14. Where such data is retained, it will be retained in accordance with the Data Protection Act 2018, General Data protection Regulations (GDPR) (May 2018) and the Privacy Notice for the Whole School Community. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded in the system log book.

Access to Images

15. Access to stored CCTV images will only be given to authorised persons, under the supervision of the Bursar, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

16. Individuals also have the right to access personal data the School holds on them (please see the Privacy Notice for Whole School Community), including information held on the System, if it has been kept. The School will require specific details including at least to time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

17. The Bursar must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples when the Bursar may authorise access to CCTV images:

- Where required to do so by the Head, the Police or some relevant statutory authority;
- To make a report regarding suspected criminal behaviour;
- To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- To assist the School in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian will be informed as part of the School's management of a particular incident;
- To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 6.2 above;
- To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
- In any other circumstances required under law or regulation.

18. Where images are disclosed a record will be made in the system log book including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).

Complaints and Queries

19. Any complaints or queries in relation to the School's CCTV system, or its use of it, or requests for copies, should be referred to the Bursar. For any other queries concerning the use of your personal data by the School, please see the Privacy Notice for the Whole School Community.

Reviewed by: Simon Mason, Bursar
Review Date: September 2026
Next Review Date: September 2027