



West Lodge School

A co-educational prep school for 3-11 year olds

CCTV Policy

1. Introduction:

Closed-Circuit Television (CCTV) images of identifiable individuals will constitute their "personal data" under data protection law, and the person who installed the camera(s) and determines how the footage is used will be the data controller of this information. This means that schools will need to comply with data protection law whenever they record, view, use, share and store images collected by CCTV (or ask others to do so on their behalf).

Data protection law imposes an obligation to keep individuals (or, in the case of younger pupils, their parents) informed of how their personal data will be used. Data protection law also confers a right to access personal data (known as the subject access right). This policy is intended to help schools meet those obligations.

Occasionally, CCTV cameras may capture images which are sensitive personal data: for example, a criminal or sexual act. The school will often have recorded this inadvertently but must be cautious in how it uses, stores or shares such information. There may be safeguarding issues in the case of certain images of children, which could require specific professional advice from the school's Designated Safeguarding Lead (DSL), or external agencies including the police, the local authority or the school's legal advisers.

School cameras can be placed wherever suits its purposes, with reasonable prominence and adequate signage. Whilst there may be justifiable safety reasons to monitor sports areas, care should be taken from a safeguarding perspective and any areas in which individuals would have a heightened expectation of privacy, including medical, changing and washroom facilities.

2. When might the school supply copies of CCTV images?

The school may be required to provide CCTV footage as evidence to authorities, most likely the police. This should be treated in the same way as other requests from authorities to share information, and with the same safeguards to ensure it is shared safely and with the right person for specific purposes only.

Separately, individuals – including members of the public and pupils and/or their parents – may assert their rights under data protection law to know and receive what CCTV information the school is holding about them. The ICO recognises that, more than usually so with subject access requests, a data controller of CCTV cameras is entitled before complying with the request to ask reasonable questions of the data subject to help it identify where to look to locate the specific footage identifying the individual. This may include time, date, location, and identifying details of how to isolate the incident or individual.

Care should be taken in disclosure when the footage contains more than one individual, although if the context is innocuous then it may be reasonable in all the circumstances for the school to disclose anyway. It may be more appropriate to let an individual view footage under supervision on school premises, rather than provide a copy (although strictly that is the right under data protection law); or alternatively it may be easier to obscure faces by providing still images that convey the information.



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3. Retention of CCTV footage

Under data protection law, personal data should not be kept for any longer than is necessary for the purposes for which it is collected.

For practical reasons, including storage space and cost, most data controllers only keep CCTV footage for a short period of time unless there is a specific reason to retain something as evidence.

4. The rights of pupils

The school acknowledges that children have their own rights under data protection law (including the right to give or withhold consent to use of their personal data, where consent is required; to be informed about its use; and subject access). Those rights would normally be exercised by someone with parental responsibility on behalf of children too young to understand them (a sensible pragmatic distinction is up to preparatory school age). However, school will make an effort to ensure the policy is drawn to the attention of older pupils, so that pupils know when and why they are being filmed by or on behalf of the school.

5. About this Policy

West Lodge School (the **School**) uses CCTV cameras to view and record pupils, parents, staff and visitors on and around our premises. We recognise that the images of individuals recorded by CCTV cameras are personal data which must be processed in accordance with data protection laws.

The purpose of this policy is to:

- outline why and how we will use CCTV, and how we will process personal data recorded by CCTV cameras;
- ensure that the legal rights of our pupils, parents, staff and visitors relating to their personal data are recognised and respected; and
- assist staff in complying with relevant legal obligations when working with personal data.

The CCTV system is administered and managed by the School, which is the controller in respect of personal data collected by our CCTV cameras. If you have any questions about this policy, please contact the Bursar.

This policy will be subject to review from time to time and should be read with reference to the School's Data Protection Policy and Privacy Notice. We will also review the ongoing use of existing CCTV cameras regularly to ensure that their use remains necessary and appropriate, and that the system is continuing to address the needs that justified its introduction.

6. Objectives

The School's purposes for 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, parents, staff and visitors with regard to their personal safety and to act as a deterrent against crime.
- To protect the School buildings and equipment, and the personal property of pupils, parents, staff and visitors from damage, disruption, vandalism and other crime.



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- To prevent and detect crime, and support law enforcement bodies in the prevention, detection and prosecution of crime as well as the identification and apprehension of offenders.
- To monitor the security and integrity of the School site and deliveries and arrivals, including car parking.
- To monitor staff and contractors when carrying out work duties.
- To assist in day-to-day management, including ensuring the health and safety of pupils, parents, staff and visitors.
- To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
- To assist the School in civil litigation, including employment tribunal proceedings.

Please note that this list is not exhaustive and other purposes may become relevant from time to time.

7. Positioning

Locations for the CCTV cameras have been selected outside our premises in places that the School reasonably believes require monitoring to address the above objectives.

Adequate signage has been placed in prominent positions around the premises to inform pupils, parents, staff and visitors that they are entering a monitored area, identifying the School as the controller operating the CCTV system.

These locations have been chosen to minimise viewing of spaces not relevant to the legitimate purposes of the School's monitoring. As far as practically possible, CCTV cameras will not focus on private property; and no images of public spaces will be captured except to a limited extent at site entrances. In addition, surveillance systems will not be used to record sound and no images will be captured from areas in which individuals would have a heightened expectation of privacy, including medical, changing and washroom facilities.

8. Maintenance

The CCTV system will be operational 24 hours a day, every day of the year. However, the recording of images will only occur at set times according to the School's needs. Recording is triggered by events involving animals, people and vehicles. Details of recording times are detailed below:

Term-time:

The front cameras will be set to event recording 24 hours a day. During the school day there will be no recording of the school playground.

The following cameras will be set to event recording during 17:30pm – 07:30am daily:

- Rear corner back door
- Rear Corner gate
- Rear Kitchen
- Rear side gate

Outside of term-time (including bank holidays):



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All cameras will operate on an event recording 24 hours a day with the exception of dates when holiday clubs are on site. The rear cameras (as listed above) will not be set to event recording while holiday clubs are in operation.

Authorised personnel will check and confirm that the CCTV system is properly recording and that cameras are functioning correctly, on a regular basis.

The CCTV system will be checked and (to the extent necessary) serviced no less than annually.

9. Supervision

We will ensure that recorded images are only viewed by approved members of staff whose roles require them to have access to such data. This may include Governors, Senior Leaders, the Caretaker and IT Network Manager. Staff using the CCTV system will be given appropriate training to ensure that they understand and observe the legal requirements related to the processing of relevant data.

Images will only be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

10. Storage

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered by CCTV cameras is stored in a way that maintains its integrity and security. Given the large amount of data generated by the CCTV system, we may store video footage using a cloud computing system. We will take all reasonable steps to ensure that any cloud service provider maintains the security of our information, in accordance with industry standards.

Images will be stored for up to 1 year, and then permanently deleted or automatically over-written unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required to retain such data for example by an appropriate third party such as the police or local authority).

Where personal data collected by the CCTV system is retained, it will be held in accordance with data protection law and our Data Protection Policy.

11. Requests for disclosure

Individuals have the right to request access to personal data that the School holds about them (otherwise known as a "subject access request", including information collected by the CCTV system, if it has been retained.

In order to respond to a subject access request, the School will require specific details including (as a minimum) the 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.

The School must also be satisfied as to the identity of the person wishing to view stored images and the legitimacy of their request.

No images from our CCTV cameras will be disclosed to a third party without express permission being given by the School. The following are examples of circumstances in which the School may authorise disclosure of CCTV images to third parties:



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- Where required to do so by the police or any relevant local or statutory authority;
- To make a report regarding suspected criminal behaviour or a safeguarding incident;
- To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- To individual data subjects (or their legal representatives) pursuant to a subject access request (as outlined above);
- To the School's insurance company where required in order to pursue a claim (for example for damage to insured property); or
- In any other circumstances required under law or regulation.

Where images are disclosed, a record will be made detailing 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).

The School reserves the right to obscure images of third parties when disclosing CCTV footage, where we consider it necessary to do so.

12. Complaints and queries

Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, 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 School's applicable Privacy Notice.

Reviewer: Bursar

Date reviewed: May 2025

Renewal date: May 2026



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CCTV FOOTAGE ACCESS REQUEST

The following information is required before the school can provide copies of or access to CCTV footage from which a person believes they may be identified.

Please note that CCTV footage may contain the information of others that needs to be protected, and that the school typically deletes CCTV recordings after a 12-month period.

Name and address: (proof of ID may be required)	
Description of footage (including a description of yourself, clothing, activity etc.)	
Location of camera	
Date of footage sought	
Approximate time (give a range if necessary)	

Signature*

Print Name.....

Date

*** NB if requesting CCTV footage of a child of preparatory school age, according to school policy, a person with parental responsibility should sign this form.**