



HEATHSIDE SCHOOL

HAMPSTEAD

CCTV Policy

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INTRODUCTION

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Heathside Preparatory School (the School). 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).

This policy has been created to comply with the provisions of:

- Data Protection Act (DPA) 2018
- General Data Protection Regulations (GDPR) 2018
- Information Commissioner CCTV Code of Practice
- Human Rights Act 1998 (Respect for private and family life)
- Regulation of Investigatory Powers Act (RIPA) 2000

The System is administered and managed by the School, which acts as the Data Controller.

This policy will be subject to review from time to time, and should be read with reference to the School's Privacy Notices and Data Protection (GDPR) Policy.

The CCTV system at Heathside is located at our Heath Street site and is owned and operated by the school, the deployment of which is determined by the school's leadership team. The system comprises a number of fixed dome cameras.

Some external venues used by the school may also have their own CCTV systems, and these are owned and operated by the venue owners.

The School CCTV is recorded 24 hours a day, 7 days a week on two independent recorders. One each per site. The recording capacity is minimum one month, but can be a little more and vary slightly due to built-in video compression technology. Once older recordings have expired, they get overwritten by fresh recordings on a continuous basis.

All fixed cameras are in plain sight on the School premises and the School does not use CCTV for covert monitoring or monitoring of private property outside the School grounds. CCTV warning signs are clearly and prominently placed at the main external entrance to the school buildings, including further signage in other outdoor areas in close proximity to camera positions.

The original specification and installation of the CCTV system was to ensure maximum effectiveness and efficiency. However, it is not possible to guarantee that the system will cover or detect every single incident taking place or angle in the areas of coverage. Please note the CCTV system only records Video. Audio is not captured by the CCTV system.

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. The school will conduct regular reviews of our use of CCTV.

1. Objectives of the System

- 1.1. To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 1.2. To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- 1.3. To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- 1.4. To monitor the security and integrity of the School site and deliveries and arrivals.
- 1.5. To monitor appropriate access to areas of the school identified for the use of particular groups.

2. Positioning

- 2.1. Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.
- 2.2. Adequate signage has been placed in prominent positions to inform staff, pupils and visitors that they are entering a monitored area.
- 2.3. No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- 2.4. No images of public spaces will be captured except to a limited extent at site entrances.

3. Maintenance

- 3.1. The CCTV System will be operational 24 hours a day, every day of the year.
- 3.2. The System Supervisors will check and confirm that the System is properly recording and that cameras are functioning correctly, on a periodic basis.

4. Supervision of the System

- 4.1. Staff authorised by the School to conduct routine supervision of the System may include the Estates Staff and IT Staff and any other relevant staff on duty.
- 4.2. 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.

5. Storage of Data

- 5.1. The day-to-day management of images will be the responsibility of the System Supervisor/s, or such suitable person as the System Supervisor/s shall appoint in their absence.

- 5.2. Images will be stored for approximately 30 days on the internal System at which point it will be 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.
- 5.3. Where such data is retained, it will be retained in accordance with the Act and our Data Retention policy
- 5.4. Remote access to the system is possible to review any out of hours footage if the need arises.

6. Privacy Policies.

Information including date/time stamps are permanently embedded on any recordings.

6. Access to Images

- 6.1. Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Supervisor/s, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access). The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures. CCTV footage may also be used for staff training purposes.
- 6.2. Individuals also have the right to access personal data the School holds on them (please see the Privacy Notices and Data Protection Policy), including information held on the System, if it has been retained. The School will require specific details including at least 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. Information requests must be for data retained in the 30 day recording period or it will be automatically overwritten.
- 6.3. The System Supervisor/s 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 System Supervisor/s may authorise access to CCTV images:

- 6.3.1. Where required to do so by the Head, the Police or some relevant statutory authority;
- 6.3.2. To make a report regarding suspected criminal behaviour;
- 6.3.3. To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- 6.3.4. 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;
- 6.3.5. 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;

- 6.3.6. To the School's insurance company where required in order to pursue a claim for damage done to insured property; or
- 6.3.7. In any other circumstances required under law or regulation.
- 6.4. Where images are disclosed under 6.3 above a record will be made, 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).
- 6.5. Where images are provided to third parties under 6.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

7. Other CCTV systems/Single Use Cameras

- 7.1. The School does not own or manage third party CCTV systems, but may be provided by third parties with images of incidents where this is in line with the objectives of the School's own CCTV policy and/or its School Rules.
- 7.2. Single use cameras may be used for functions/School Events/Marketing, these images are protected and covered by the Privacy Policies and Use of Photography Policy and may be kept for the purposes stated in those Policies.

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act/GDPR.

All requests should be made in writing to GDPR@heathsideprep.co.uk. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time, location, and verification of identity.

The school will respond to requests within 1 calendar month of receiving the written request and any fee (if applicable). This is as per the ICO CCTV Code of Practice.

The School will not normally charge a fee to comply with a subject access request. However, where the request is manifestly unfounded or excessive the School may charge a "reasonable fee" for the administrative costs of complying with the request.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation or open legal claim.

Please refer to our Data Protection Policy for further details.

Access to and Disclosure of Images to Third Parties

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).

Requests for images / data should be made in writing to GDPR@heathsideprep.co.uk or directly to the Head Teacher.

The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

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 System Manager/s in writing to the School or by email.

The CCTV System Supervisor is our Data Protection lead, Andy Mirza.

Email: GDPR@heathsideprep.co.uk

Alternatively, the Headteacher can be contacted at: head@heathsideprep.co.uk

Please also refer to the following policies:

Health and Safety Policy

Acceptable Use Policy

Privacy Policy

E-Safety Policy

Data Protection (GDPR) Policy