



## CCTV POLICY

***This policy applies to all children, their parents, staff, volunteers, Governors and visitors at Unicorn School.***

***This policy is on the public section of the website.***

***The School has appointed the Bursar as Data Protection Controller to fulfil their role as Data Controller.***

This Policy links to the Privacy Notice and the Data Protection Policy.

### RESPONSIBILITY

Staff Member:

Bursar

**Last Reviewed:**

**October 2025**

**Next Review:**

**October 2028**

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

The CCTV System is administered and managed by the School, who act as the Data Controller. The policy will be subject to review from time to time, and should be read with reference to the School's Data Protection Policy and the Privacy Notice.

The School operates two cameras at the front of the Main Building which are positioned:

- pointing towards the pedestrian gate;
- pointing towards the base of the Fire Escape

The school operates three cameras to the rear of the Main Building which are positioned:

- pointing towards the astro-turf, playground and quiet garden

The School does not use CCTV for monitoring outside the School grounds.

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's Legitimate Purposes for Using the CCTV System**

- 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; and
- To monitor the security and integrity of the School site and deliveries and arrivals thereto.

## **Positioning**

- Locations have been selected that the School reasonably believes require monitoring to address the stated legitimate purposes;
- Adequate signage has been placed in prominent positions to inform parents, staff, volunteers and visitors that they are entering a monitored area. This policy is available on the public section of the School's website in order to identify the School as Data Controller and to give contact details for further information regarding the CCTV System;
- No images will be captured from areas in which individuals would have a heightened expectation of privacy, including washroom facilities;
- No images of other public spaces in the School will be captured.

## **Maintenance**

- The CCTV System will be operational 24 hours a day, during School term times only;
- The System Manager (defined below) will check and confirm that the CCTV System is properly recording and that cameras are functioning correctly, on a regular basis.

## **Supervision of the CCTV System**

- Only staff authorised by the School may conduct routine supervision of the CCTV System;
- 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.

## **Storage of Data**

- The day-to-day management of images is the responsibility of the Bursar who will act as the System Manager, or such suitable person as the System Manager shall appoint in their absence;
- Two weeks' worth of images will be stored, and automatically over-written unless the School considers it reasonably necessary for the pursuit of the legitimate purposes outlined above, or if lawfully required by an appropriate third party such as the police or local authority;

- Where such data is retained, it will be retained in accordance with Data Protection Law and our Data Protection Policy. Information including date, time and length of the recording, as well as the locations covered and groups/individuals recorded, will be recorded in the CCTV System log book.

## **Access to Images**

- Access to stored CCTV images will only be given to authorised staff and/or an appropriate third party as outlined above, under the supervision of the System Manager, in pursuance of the above legitimate purposes (or if there is some other overriding and lawful reason to grant such access);
- As CCTV images will only be available during School term times, access to data will not be available to third party hirers of the School during Half Term breaks, Christmas Holiday, Easter Holiday or Summer Holiday periods
- Individuals also have the right to access personal data the School holds on them (please see the Data Protection Policy), including information held on the CCTV System, if it has been kept. The School will require specific details including at least time, date and camera location before it can respond properly to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable;
- The System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the CCTV System and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV images:
  - where required to do so by the Police or some relevant statutory authority;
  - to make a report regarding suspected criminal activity;
  - to data subjects (or their legal representatives) pursuant to an access request under Data Protection law and on the basis set out earlier;
  - 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.
- Where images are disclosed under circumstances detailed above, a record will be made in the CCTV System log book including the name of the person viewing the images, the time of access, the reason for viewing the images, the details of the images viewed and the crime incident number (if applicable)

## **Complaints and queries**

- Any complaints or queries in relation to the School's CCTV System, or its use of CCTV, should be referred to the Bursar in the first instance. Unresolved complaints or queries should be referred to the Information Commissioner's Office (ICO) via a live chat on their website or by calling their helpline at 0303 123 1113