

Woodpecker Court

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Woodpecker Court

"Where learning meets the outdoors"

Woodpecker Court CCTV Policy V7

Relationships, Respect, Resilience

Routine

Version control

Version	Reviewed by	Future Review date	Comments	Approved by board
V1	ES	Feb 2021	Policy written and implemented	06/02/2020
V2	ES	Jan 2022	Policy reviewed and updated	21/01/2021
V3	RM	Apr 2023	Version control added. Policy reviewed and updated	21/04/2022
V4	MAN	Mar 2024	Policy reviewed and updated	23/03/2023
V5	MAN	Mar 2025	Cameras updated	15/06/2023
V6	NLA	Mar 2025	Cameras updated	17/05/2024
V7	NLA	Mar 2025	Cameras updated	02/12/2024

1. Introduction

The provision recognises that CCTV systems can be privacy intrusive.

For this reason, the provision has carried out a data protection impact assessment with a view to evaluating whether the CCTV system in place is a necessary and proportionate means of achieving the legitimate objectives set out below.

The result of the data protection impact assessment has informed the provision's use of CCTV and the contents of this policy.

Review of this policy shall be repeated regularly, and whenever new equipment is introduced a review will be conducted and a risk assessment put in place. We aim to conduct reviews no later than every two years.

2. Objectives

The purpose of the CCTV system is to assist the provision in reaching these objectives:

- (a) To protect students, staff and visitors against harm to their person and/or property.
- (b) To increase a sense of personal safety and reduce the fear of crime.
- (c) To protect the provision buildings and assets.
- (d) To support the police in preventing and detecting crime.
- (e) To assist in identifying, apprehending and prosecuting offenders.
- (f) To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence
- (g) To assist in managing the provision.

3. Purpose Of This Policy

The purpose of this Policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at the provision. The CCTV system used by the provision comprises of:

CAMERA TYPE	LOCATION	SOUND	RECORDING CAPACITY	SWIVEL / FIXED
180° fixed camera	Looking down the drive	Y Only when call button pressed	Y	F
180° fixed camera	On toilet block looking towards the stable and across the paddock	N	Y	F
180° fixed camera	Rear gate post	Y Only when call button pressed	Y	F
180° fixed camera	On classroom 3 looking over small paddock and entrance to site 2	N	Y	F
Fixed ANPR Camera	On the gate post of the main gate, looking down the drive for car registrations	N	Y	F
180° fixed camera	Front of bin store looking over taxi turning circle and rear of community cafe	N	Y	F
180° fixed camera	On front lamp post looking up towards coach house	N	Y	F
180° fixed camera	On rear of classroom 5 looking towards woods and shepherds hut	N	Y	F

180° fixed camera	On gate post by the pig runs and parachute 2 looking over community cafe	N	Y	F
180° fixed camera that moves location as necessary	Animal Camera that operates using solar power to assist with animal welfare	N	Y	F
180° fixed camera	On rear of Classroom 3 overlooking our road and the defibrillator	N	Y	F
180° fixed camera	On side of classroom 1 looking towards paddock towards parking compound and ice house	N	Y	F
180° fixed camera	On tree on drive opposite vehicle parking compound	N	Y	F
180° fixed camera	on side of kitchen building overlooking site 1 fireside and rear paddock gate	N	Y	F
110° fixed camera	In pole barn looking over the workshop side	N	Y	F
110° fixed camera	On the gate post by the pig runs and parachute 2 looking down through educational woods side towards site 1	N	Y	F
110° fixed camera	In the pole barn looking over where the equipment is stored	N	Y	F
110° fixed camera	On the side of the pole barn looking towards classrooms 4 and 6	N	Y	F
110° fixed camera	On the front of the principals office facing towards the commercial kitchen	N	Y	F
110° fixed camera	On the end of the principals office facing the platform and parachute 3	N	Y	F

4. Statement Of Intent

Notification has been submitted to the Information Commissioner and the next renewal date has been recorded. The CCTV system will seek to comply with the requirements both of the Data Protection Act and the most recent Commissioner's Code of Practice.

The provision will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

The system has been designed so far as possible to deny observation on adjacent private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design has endeavoured to ensure that the system will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible on the site and make clear who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

Recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated. In the absence of compelling a need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 14 days.

5. System Management

Access to the CCTV system and data shall be password protected and be in a locked cabinet in a locked room.

The CCTV system will be administered and managed by Dominic Meehan who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager the system will be managed by a designated safeguarding lead.

The system and the data collected will only be available to the Systems Manager, his/her replacement and appropriate members of the senior leadership team as determined by the Principal.

The CCTV system is designed to be in operation 24 hours a day 365 days a year, though the provision does not guarantee that it will be working during these hours.

The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.

Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by proving clear, usable images. We reserve the right to move camera should the need arise to better safeguard students, staff or property. Signage will also be moved to reflect any changes.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

Where a person other than those mentioned in paragraph 5.3 above, requests access to the CCTV data or system, the System Manager must satisfy him/herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists access will be refused.

Details of all visits and visitors will be recorded in a system log book including time/data of access and details of images viewed and the purpose for so doing.

6. Downloading Captured Data Onto Other Media

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures: -

- (a) Each downloaded media must be identified by a unique mark.
- (b) Before use, each downloaded media must be cleaned of any previous recording.
- (c) The System Manager will register the date and time of downloaded media insertion, including its reference.
- (d) Downloaded media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a downloaded media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.
- (e) If downloaded media is archived the reference must be noted.

Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his/her replacement and the Principal and other authorised senior leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the downloaded media (and any images contained thereon) remains the property of the provision, and downloaded media (and any images contained

thereon) are to be treated in accordance with Data Protection legislation. The provision also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the provision to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until they are needed by the police.

Applications received from outside bodies (e.g. solicitors or parents) to view or release images will be referred to the provision's Data Protection Officer and a decision made by a senior leader of the provision in consultation with the provision's data protection officer.

7. Complaints About The Use Of CCTV

Any complaints in relation to the provision's CCTV system should be addressed to the Principal using the complaints policy.

8. Request For Access By The Data Subject

The Data Protection Act provides Data Subjects – those whose image has been captured by the CCTV system and can be identified - with a right to access data held about themselves, including those obtained by CCTV. Requests for such data should be made to The Data Protection Officer.

9. Public Information

Copies of this policy will be available to the public from the office.

Appendix 1: Relevant legislation and guidance

This policy is based on:

Legislation

- › [UK General Data Protection Regulation](#)
- › [Data Protection Act 2018](#)
- › [Human Rights Act 1998](#)
- › [European Convention on Human Rights](#)
- › [The Regulation of Investigatory Powers Act 2000](#)
- › [The Protection of Freedoms Act 2012](#)
- › [The Freedom of Information Act 2000](#)
- › [The Education \(Pupil Information\) \(England\) Regulations 2005 \(as amended in 2016\)](#)
- › [The Freedom of Information and Data Protection \(Appropriate Limit and Fees\) Regulations 2004](#)
- › [The School Standards and Framework Act 1998](#)
- › [The Children Act 1989](#)
- › [The Children Act 2004](#)
- › [The Equality Act 2010](#)

Guidance

- › [Surveillance Camera Code of Practice \(2021\)](#)