

CCTV POLICY

<p>Policy Owner</p> <p>Estates Director, Senior Deputy Head (TP) and Facilities and Resource Manager (PPSG)</p>	<p>Applies to</p> <p>Prior Park Schools (Trust Wide)</p>	<p>Superseded documents</p> <p>CCTV Policy v2</p>
<p>Associated documents</p> <p>Privacy Notices Data Protection Policy Subject Access Request form Complaints Policy</p>	<p>Review frequency</p> <p>Every three year (unless the legislation/regulations update before this time)</p> <p>Implementation date</p> <p>1 February 2025</p>	<p>Legal Framework</p> <p>Information Commissioner's CCTV Code of Practice Data Protection Act 2018 UK General Data Protection Regulations 2019 KCSIE Working together to safeguard children 2023</p>

This policy is reviewed triennially, or more regularly as required, prior to approval by Trustees, where applicable.

Last reviewed by:	Estates Director (Mr T Tootill), Estates Manager (Mr M Crudge), Facilities and Resource Manager (Ms B Navarro), Deputy Head (Mr J Ryan) and Head of Compliance (Miss E Wickham)
Date last reviewed:	December 2024
Approved by Trustees:	NA Approved by the Director of Operations and Finance (Ms E Sandberg)
Date last approved:	24 January 2025
Date for next approval:	January 2028

1. Introduction

Prior Park Schools (PPS) is a family of Christian schools based in Bath and Gibraltar. Prior Park College (PPC) and The Paragon School (TP) are incorporated in England as Prior Park Educational Trust Ltd. Prior Park School Gibraltar (PPSG), is incorporated in Gibraltar as Prior Park School Ltd. Both are companies limited by guarantee and registered charities.

The Prior Park Schools mission, underpinned by shared values, is to steward a thriving family of communities with love for the young people they serve at their heart. These vibrant communities cultivate creativity, foster integrity, and transform lives.

Prior Park Schools Values

Curiosity - Generosity - Courage

2. Purpose

The purpose of this policy is to regulate the security, management and operation of the Closed-Circuit Television (CCTV) System across Prior Park Schools. It also serves as a notice and a guide to data subjects (including students, parents, staff, trustees, volunteers, contractors, visitors to the school and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the **System**).

The System is administered and managed by the Trust who act as the Data Controller. The Board of Trustees have delegated responsibility to the Director of Operations and Finance (DOF) to act on their behalf as the Data Protection Controller who will endeavour to ensure that all Personal Data is processed in compliance with this Policy and the principles of the UK GDPR. Any questions about the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the Prior Park Schools Head of Compliance (HoC), who acts as the nominated person with responsibility for Data Protection processes.

This policy will be subject to review biennially and should be read with reference to Data Protection Policy, Data Retention and Destruction Handbook Policy and Privacy Notice(s). For further guidance, please review the Information Commissioner's CCTV Code of Practice.

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.

See appendix A to this policy for a list of all current CCTV camera locations on all school premises.

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

For the purposes of this policy the word School means one, or all schools, within the Trust.

3. Objectives of the System

- To protect students, staff (and those living on site), trustees, volunteers, contractors, visitors and members of the public with regard to their personal safety.
- Safeguarding and child protection are at the forefront of all that we do and underpin all relevant aspects of all systems, processes and policies and should operate with the best interests of the child at their heart.
- To protect the School buildings and equipment, and the personal property of students, staff, trustees, 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, including car parking.

4. Positioning of CCTV Cameras

Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the above stated objectives. New locations may be added periodically in response to specific incidents or operational requirements, and these will be updated in the schedule of locations - Appendix A.

Adequate signage has been placed in prominent positions to inform everyone that they are entering a monitored area, identifying the Trust as the Data Controller and giving contact details for further information regarding the system.

No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities. ,

At PPC CCTV cameras will not be positioned inside Boarding Houses.

At PPC 'live' only CCTV cameras are situated inside the Sixth Form Centre and adjacent Sixth Form workroom (the Dairy).

No images of public spaces will be captured except to a limited extent at site and main building entrances.

5. System Controls

- The System is operational 24 hours a day, every day of the year.
- PPS' Data Controller is the Director of Operations and Finance (DOF), and they have overall responsibility for the System.
- The DOF authorises which staff can access the system on each occasion, when requested.
- The DOF has delegated the day-to-day management of the system to the Estates Director and Estates Manager at PPC and TP, and the Facilities and Resource Manager at PPSG.

- The Estates Director and Facilities and Resource Manager will check and confirm that the System is in full working order and that cameras are functioning correctly, on a regular basis, either themselves or by delegating this to a ‘system engineer’ e.g. the School Electrician/External supplier.
- The System Engineer is not authorised to check the data for any other purposes.
- The System will be checked and (to the extent necessary) serviced no less than annually.
- Authorised Staff (as detailed below) have authority to view data when required to do so and only after being granted permission.

6. Access to the System

Only those staff, noted below, may view recorded CCTV footage, once authorisation by the DOF has been granted. If the DOF is not available to grant consent, the Head of Compliance may give consent. A log of the date, time, authorised staff member name and overview of the footage viewed will be kept by the DOF.

In the rare circumstances where access to CCTV is deemed time-critical for safety or security reasons, the designated site wide staff from each school (defined below) may have delegated authority to access CCTV recordings, but a clear record must be kept of the date, time, purpose and outcome that required access and this should be submitted to the DOF for retrospective approval as soon as possible.

PPC CCTV System	Authorised access to view data	Consent required from the DOF	Live and recorded data	Live data only
Group A Site wide (including the Sports Centre, Boarding Houses and Sixth Form Centre)	Head Estates Director Estates Manager DSL/Deputy Head Pastoral Residential Maintenance Technician Head of Compliance Head of HR	YES	YES	NA
Group B Sixth Form Centre	Group A +: Assistant Head, Sixth Form Sixth Form Administrator	NO	NO	YES
Group C Minibus Dashcam and audio	Group A +: Transport Manager Estates Director	YES	YES	YES
PPC CCTV System	Technical support access only (not permitted to view data)	Live and recorded data		Live data only
Site wide	Electrician ICT	YES		NA

TP CCTV System	Authorised access to view data	Consent required from the DOF	Live and recorded data	Live data only
Group A Site wide	Head Estates Director Estates Manager Deputy Head	YES	YES	NA

	DSL/Deputy Head Pastoral Residential Maintenance Technician Head of Compliance Head of HR			
Group B Minibus audio	Group A+: Transport Manager Estates Director	YES	YES	YES
TP CCTV System	Technical support access only (not permitted to view data)	Live and recorded data		Live data only
Site wide	Electrician ICT	YES		NA

PPSG CCTV System	Authorised access to view data	Consent required from the DOF	Live and recorded data	Live data only
Site wide	Head DSL Deputy Head Operations and Pastoral Head of Support Services Head of Compliance Head of HR DOF	YES	YES	NA
PPSG CCTV System	Technical support access only (not permitted to view data)	Live and recorded data		Live data only
Site wide	External Contractor FSG and PPC Electrician	YES		NA

Each member of staff authorised to access the CCTV recording will do so using their **own user account and password** to allow for our IT system to track who has accessed information. This provides an additional safeguarding measure.

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.

If any other individual requires access to the CCTV recordings, they must first get authorisation to do so from the DOF, and the DOF may nominate an authorised member of staff to view the CCTV footage on their behalf.

7. Reasons why the data may need to be accessed

The following are examples when and why authorised staff may access CCTV footage:

- If required to do so by 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 student behaviour, in which case, the parents/guardian will be informed as part of the School's management of a particular incident.
- To assist the School in establishing facts in cases of unacceptable staff behaviour.
- If data subjects (or their legal representatives) requests access to their data under the Data Protection Act.

- 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.

8. Storage of Data

Images will be stored for 30 days and automatically over-written 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.

Where such data is retained, it will be retained in accordance with the Data Protection Act and Trust's Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded by the DOF.

9. Access to Stored Images

Access to stored images is as per section 6 (Access to the System).

Data Subject also have the right to Personal Data the School holds about them (please see the Privacy Notice(s) and Data Protection Policy), including information held on the System, if it has been kept. The School will require individuals to submit a Data Subject Access Request to the Director of Operations and Finance, which will include 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. This record of this data subject access request will be kept by the Head of Compliance.

10. Dashcams and Internal Audio recording devices (PPC and TP Only)

Each school owned minibus is fixed with a dashcam and internal audio recording device. The recordings are saved to a memory card. The audio recording device can be used for both safeguarding and pastoral concerns (behaviour) relating to students and staff.

The dashcam provides a recording of the external view of the minibus, to provide assurances the minibuses are being driven safely.

Both the dashcam and audio recording device must be switched on for every journey, whether students are on board the minibus or not.

11. Other CCTV systems

The School does not own or manage third party CCTV systems but may be provided by third parties with images of incidents where this in line with the objectives of the School's own CCTV policy.

Coaches provided by third party contractors are equipped with CCTV systems. The School may use these in establishing facts in cases of safeguarding and pastoral concerns (for example unacceptable student behaviour).

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 Director of Operations and Finance.

13. Data Protection

To ensure fair processing, Personal Data (which includes visual and audio images and recordings) will not be retained by PPS for longer than necessary in relation to the purposes for which it was originally collected, or for which it was further processed. The length of time for which we need to retain Personal Data is set out in our 'Data Retention and Destruction Handbook Policy'. This takes into account the legal and contractual requirements, both minimum and maximum, that influence the retention periods set forth in the schedule.

For any other queries concerning the use of your personal data by the School, please see the School's applicable Privacy Notice.

Appendix A - Current CCTV Locations

Building / Position	View	Recorder Position
Prior Park College		
Main entrance		
St Pauls Gate Entrance (on Parapet)	1 x Front gates 1 x ANPR 1 x Main Drive	Sports Hall Data Cab
On Gate	1 x Intercom	Sports Hall Data Cab
Priory		
High level above residential staff door	Towards top entrance to the Priory	St Marys Office
On East Gable to extension	Over the drive to the front of the Priory	St Marys Office
North corner of extension	Looking west towards the front and lower door of the priory	St Marys Office
Front door	Viewing the front door	St Marys Office
Above the office external door	Viewing west looking down the path	St Marys Office
All Saints Front	2 x Front All Saints	St Marys Office
Butts' car park		
By Monument Field gate	1 x Towards Kent House corner 1 x Facing south up the car park 1 x Facing Monument Field Gate Track	Old Gym DT Data Cab
Internal on Ball Court (south staircase)	Viewing the staircase, workshop door and entrance door	Old Gym DT Data Cab
On grass between Ball Court and Astro	1 x Looking north down the car park 1 x looking west towards the Pavilions	Old Gym DT Data Cab
Astro	1 x Observatory 2 x Astro	Old Gym DT Data Cab Old Gym DT Data Cab
Sports centre		
Sports Hall	Viewing the hall	Sports Hall Data Cab
Reception	Viewing the entrance and reception area	Sports Hall Data Cab
Fitness suite	Viewing the fitness suite	Sports Hall Data Cab

Externally 14 Cameras (around the building)	Viewing the whole perimeter of the sports centre including the coach bay and partial view of the exit gates	Sports Hall Data Cab
Exit Gate		
CCF Garage	1 x Facing exit gate 1 x Facing gate approach	Sports Hall Data Cab
End Theatre Block	1 x Facing exit gate	Sports Hall Data Cab
Mansion		
Mansion Main Door	1 x Intercom	Sports Hall Data Cab
Sixth Form Centre and Dairy	1 x Live Camera	NA
Pavilion		
Pavilion	1 x Facing Pavilion Door	Pavilion Data Cab
Lamp Post Next to Pavilion	1 x Facing East Along Drive 1 x Facing West Along Main Drive	Pavilion Data Cab
Science Block		
Science Block	1 x Facing St Pauls Main Door and Chapel Door 1 x Facing along drive towards Mansion	Sports Hall Data Cab
St Peters		
End Maths Corridor External	1 x Facing New Founders Garden / Defib	Sports Hall Data Cab

The Paragon school		
East side of Lyncombe house	East towards the main drive	Lyncombe House Data Cab
Front of Lyncombe house	View the front door, front car park and the front lawn	Lyncombe House Data Cab
Hall entrance	view externally of the hall entrance	Lyncombe House Data Cab
East Gable of Frew	View of pedestrian entrance and staff carpark	IT Office Data Cab
North side of Frew	View of the reception Garden	IT Office Data Cab
West side of Frew	View of early years quad	IT Office Data Cab
West side of room 13 Brand	View of brand main entrance	IT Office Data Cab
West side of room 13 Brand	View from Brand building up to Lyncombe house	IT Office Data Cab
South side of brand room 12 high level	View across the front of brand towards the exit drive	IT Office Data Cab

East side of Brand exit drive	1 camera viewing the Exit gate, 1 camera viewing up the drive from the exit gate	IT Office Data Cab
Main Front Door	1 x Intercom	Lyncombe House Data Cab
Music Lodge	1 x Facing Playground	Lyncombe House Data Cab
Main Gate	1 x ANPR 1 x Intercom	Lyncombe House Data Cab

Prior Park School Gibraltar		
Middle courtyard by rear reception door D1	Middle courtyard towards Quad stairs	Server room
Main entrance courtyard - internal view D2	From gate towards reception	Server room
Main entrance gate (Arengo's Palace Road) D3	Main entrance gate - external	Server room
Rear Gate Exit D4	Rear gate	Server room
Blue toilets corridor D5	Outside female WC towards gym	Server room
Lunch area D6	Lunch hall and surrounding area	Server room
Playground D7	Lower playground and rear entrance gate	Server room
Table tennis area D8	table tennis area	Server room
Chapel Corridor D9	Chapel corridor and entry way from courtyard	Server room
Library Corridor D10	Library corridor and entry way from courtyard	Server room