GIGGLESWICK
SCHOOL

CCTV Policy

Lead Author(s)	Bursar
Reviewed by	Headmaster Bursar Head of the Prep School
Last review	September 2026
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Next review	August 2027
Policy Type	Statutory

CCTV policy

1.1 This Policy
The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) System ("the System") at Giggleswick School ("the School").

The School uses the System to view and record pupils, parents, staff, volunteers 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.

This policy should be read with reference to the School's Data Protection Policy. For further guidance, please review the Information Commissioner's CCTV Code of Practice (accessible here [link]).

A breach of this policy may, in appropriate circumstances, be treated as a disciplinary matter. Following investigation, a breach of this policy may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

The System is administered and managed by the School, who act as the Data Controller in respect of personal data collected by our CCTV cameras. If you have any questions about this policy, please contact the Bursar at bursar@giggleswick.org.uk.

This policy will be subject to review from time to time to ensure that CCTV use remains necessary and appropriate, and that the system is continuing to address the needs that justified its introduction.

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.

1.2 Objectives of the 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 objectives of the System are to:

- protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- support the police and community in preventing and detecting crime and assist in the identification and apprehension of offenders.
- monitor the security and integrity of the School site and deliveries and arrivals including car parking and number plate recognition.
- monitor staff and contractors when carrying out work duties.
- monitor and uphold discipline among pupils in line with the School Rules, which are available to parents and pupils on request.

1.3 Positioning
Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives.

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

1.4 Maintenance
The CCTV System is operational 24 hours a day, every day of the year. Authorised personnel will check and confirm that the CCTV system is properly recording and that cameras are functioning correctly, on a regular basis.

1.5 Supervision of the System
The day-to-day management of images will be the responsibility of the Second Master who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.

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 security, HR and safeguarding / pastoral staff. 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 be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

1.6 Storage of data
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. We may also engage data processors to process data on our behalf. We will ensure appropriate contractual safeguards are in place to protect the security and integrity of the data.

Images will be stored for no more than 90 days, and permanently deleted 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 system is retained, it will be held in accordance with data protection law and our 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 in the system log book.

1.7 Requests for disclosure
Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

Individuals have the right to request access to personal data that the School holds about them (otherwise known as a "subject access request", on which please see the School's Privacy Notice [and Data Protection Policy] for further information), 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:

a) Where required to do so by the Police or some relevant statutory authority;

b) To make a report regarding suspected criminal behaviour or a safeguarding incident;

c) To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;

d) 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;

e) To individual data subjects (or their legal representatives) pursuant to a subject access request (as outlined above);

f) To the School's insurance company where required in order to pursue a claim for damage done to insured property; or

g) In any other circumstances required under law or regulation.

Where images are disclosed, a record will be kept 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).

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

1.8 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 and/or its School Rules.

Some pupils travel to School on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The School may use these 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.

1.9 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 at bursar@giggleswick.org.uk.

Annex – CCTV Footage Access Request

Reviewed by:	Dr KD Sharifi CBE, Bursar and Data Protection Coordinator
Updated:	September 2025
Next review date:	September 2026

ANNEX - CCTV FOOTAGE ACCESS REQUEST

The following information is required before Giggleswick 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 one month.

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 under 13, a person with parental responsibility should sign this form. For children 13 or over, the child's authority or consent must be obtained except in circumstances where that would clearly be inappropriate and the lawful reasons to provide to the parent(s) outweigh the privacy considerations of the child.**