CCTV Policy

Reviewed by:	Nurette Stanford - Bursar	August 2026
Approved by:	Trish Watt -Head	September 2026
Governor Approval:	Suzie Longstaff	September 2026
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Policy Aims

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Eaton Square Prep. 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).

The System is administered and managed by the School, who act 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 Data Protection Policy.

For further guidance, please review the Information Commissioner's CCTV Code of Practice by clicking here.

Purpose of 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.

Objectives of the 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.
- To monitor the security and integrity of the School site and deliveries.
- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the School Behaviour Policy, which are available to parents and pupils on request.

CCTV System

Location
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.

The School's CCTV system comprises of 6 cameras covering:

	Name	Location
1	Reception 1	Above front door of 56 entrance.
2	Reception 2	Above door outside lifts on ground floor
3	Reception 3	Above Cabinet of Curiosity looking over reception desk area.
4	Door to 55 Eccleston Square	On stairs looking directly at the internal side of the door to 55 Eccleston Square
5	Door to 57 Eccleston Square	On stairs looking directly at the internal side of the door to 57 Eccleston Square
6	55 Basement Outside	Outside in the footwell of 55 looking back at the stairs leading down.
7	56 Basement Outside	Outside in the footwell of 56 looking back at the stairs leading down.
8	57 Basement Outside	Outside in the footwell of 57 looking back at the stairs leading down.
9	Beehive	2 x cameras Above the door leading to the main reception. Above the door off the 56 corridor
10	Treehouse	2 x cameras In the corner above the window in the right-hand side Above the door – privacy block over nappy changing area.
11		
12	Canteen 1	On ceiling near the bifold doors focusing on main dining hall area.
13	Canteen 2	On ceiling near the bifold doors focusing on the main food serving area.
14	Sussex St	Vault & football pitch area
15	Sussex St	Entrance to building
16	Sussex St	Climbing frame
17	Sussex St	Inside building
18	Reception Classroom	Above door
19	Reception Classroom	In corner above teacher desk

All internal cameras are clearly marked with a sign. No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.

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

The recorders are securely located in the server room which is locked at all times.

The data produced by the CCTV system is the property of Eaton Square Prep School.

The Bursar is the Data Controller, and therefore responsible for the management of the data collected, and stored by the School.

Cameras are digital with individual IP addressed, hardwired back to the recorder location on each site. Images collected by the cameras are stored digitally on the recorder only which is only accessible by those detailed below.

Maintenance
The CCTV System will be operational 24 hours a day, every day of the year.

The System Manager will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.

The System will be checked and (to the extent necessary) serviced no less than annually.

CCTV Monitoring

Data collected from the School's CCTV system is securely stored at the School, and can only be accessed by authorised personnel detailed below. Access is via invite only by the Data Controller.

Name	Role	Access Rights
Daniel Coupland	Bursar - Data Controller	Read & Write Access
Ali Syed	IT – Systems Manager	Read & Write Access
Tom Mallinson	Facilities Manager	Read & Write Access
Trish Watt	Head	Read & Write Access
Chris Hancock	Deputy Head Pastoral	Read & Write Access

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.

For requests to view footage involving pupils, two members of staff listed above must be present. All requests must be logged in the CCTV Monitoring log.

Data Retention

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

Images will be stored for up to 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 Act 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.

Access to Images

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

Individuals also have the right to access personal data the School holds on them (please see the School's Data Protection Policy), including information held on the System, if it has been kept. The School will require 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.

The Data Controller 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 Data Controller may authorise access to CCTV images:

- Where required to do so by the Head, 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 pupil behaviour, in which case, the parents/guardian will be informed as part of the School's management of a particular incident;
- To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out above;
- 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 a record will be made in the system log 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).

Where images are provided to third parties, wherever practicable steps will be taken to obscure images of non-relevant individuals.

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 Behaviour Policy.

Many 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.

Complaints & 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.

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