WETHERBY PREPARATORY SCHOOL
MARYLEBONE

inspired

Wetherby Preparatory School
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CCTV Policy

Policy reviewed by:	Lloyd Jackson
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Reviewer's signature:	
Head's signature:	

Circulation: This policy is addressed to all members of staff and volunteers and is available to parents on request. It applies wherever staff or volunteers are working with the boys.

Please note: 'School' refers to Wetherby Preparatory School and 'parents' refers to

parents, guardians and carers.

Wetherby Preparatory School
CCTV Policy

1. About this Policy

Wetherby Preparatory School (the **School**) uses CCTV cameras to view and record pupils, parents, staff 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 relevant 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.

A breach of this policy may, 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 CCTV system is administered and managed by the School, which is the 'controller' in respect of personal data collected by our CCTV cameras. If you have any questions about this policy, please contact: dpo@inspirededu.com.

This policy will be subject to review from time to time, and should be read with reference to the School's Data Protection Policy and applicable Privacy Notice. We will also review the ongoing use of existing CCTV cameras regularly to ensure that their use remains necessary and appropriate.

2. Objectives of using CCTV

The School's purposes for 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.

- To protect pupils, parents, staff and visitors with regard to their personal safety and to act as a deterrent against crime.
- To protect the School buildings and equipment, and the personal property of pupils, parents, staff and visitors from damage, disruption, vandalism and other crime.
- To prevent and detect crime, and support law enforcement bodies in the prevention, detection and prosecution of crime as well as the identification and apprehension of offenders.
- To support relevant agencies / local authorities in the investigation of child protection-related incidents.

- To monitor the security and integrity of the School site and deliveries and arrivals, including car parking and number plate recognition.
- To monitor staff and contractors when carrying out work duties.
- To monitor and uphold discipline among pupils in line with the School's rules, which are available to parents and pupils on request.
- To monitor and uphold parental compliance with the Parent Code of Conduct for the benefit of the School community.
- To assist in day-to-day management, including ensuring the health and safety of pupils, parents, staff and visitors.
- To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
- To assist in civil litigation, including employment tribunal proceedings.

Please note that this list is not exhaustive and other purposes may become relevant from time to time.

3. Positioning

Locations for the CCTV cameras have been selected, both inside and outside our premises, that the School reasonably believes require monitoring to address the above objectives. On this basis, CCTV cameras are located in various areas in our premises including the locations set out below:

- Corridors
- Stairwells
- Exit Points
- Entrance Points
- Bike Store

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.

4. Maintenance

The CCTV system will be 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.

The CCTV system will be checked and (to the extent necessary) serviced as appropriate.

5. Supervision

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, or other senior members of staff within the Inspired Education Group. 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 only be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access by unauthorised persons.

6. Storage

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 as long as is required for the legitimate purposes of the School and in compliance with applicable law, 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 CCTV system is retained, it will be held in accordance with applicable data protection law and our Data Protection Policy.

7. Requests for disclosure

No images from School CCTV cameras will be disclosed to a third party (including parents) without express permission being given by the School and the Inspired Global DPO and external School DPO (as applicable). The School will only use, and consider disclosure of, CCTV images for the School's legitimate purposes in its absolute discretion and subject only to the requirements of competent authorities.

The following are examples of circumstances in which the School may authorise disclosure of CCTV images to third parties:

- Where required to do so by the police or any relevant local or statutory authority;
- To make a report regarding suspected criminal behaviour or a safeguarding incident;
- To government, local authorities, statutory agencies and/or regulatory bodies, particularly where there are safeguarding concerns;
- To assist the School in establishing facts in cases of unacceptable pupil or parent/guardian behaviour, in which case the pupil's parents/guardian will be informed as part of the School's management of a particular incident;
- To individual data subjects (or their legal representatives) pursuant to a subject access request (as outlined below);
- To the Inspired Education Group (the **Group**), or other entities within the Group;
- To the School's insurance company where required in order to pursue a claim (for example for damage to insured property); or
- In any other circumstances required under law or regulation.

The School reserves the right to obscure images of third parties when disclosing CCTV footage, where

we consider it necessary to do so.

Please note that any requests for disclosure of CCTV footage should be referred to the Global DPO (contact: dpo@inspirededu.com) and (if applicable) the School's external DPO in accordance with the reporting policy contained in the Data Protection Rights Policy. No action on any such request should be taken unless first referred to, and approved by, the Global DPO and/or School external DPO.

For reference, any request for CCTV footage will require specific details including (as a minimum) the time, date and camera location and, if necessary, information identifying the individual before Inspired / the School can properly respond to any such requests. This right is also subject to certain exemptions from access, including in 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.

8. 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 dpo@inspirededu.com.

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

Last Updated: July 2026