

BOARDING CCTV POLICY and PRIVACY IMPACT ASSESSMENT (PIA)**This policy applies to the whole College, including boarding***This document applies to the whole college inclusive of boarding.***1. Availability and Scope**

This policy applies to the whole College, including the Boarding House, and is publicly available on the College website. Copies may be obtained from the College Office and are available in large print or alternative formats on request.

This policy applies to all staff, students, parents, visitors, contractors and any other individuals whose images may be captured by the College's Closed-Circuit Television (CCTV) system, both on and off College premises where CCTV is in operation.

2. Purpose of CCTV

The CCTV system at David Game College is installed for the following purposes:

- To safeguard the welfare of students, staff and visitors
- To support safeguarding and child protection arrangements
- To deter and detect crime, bullying and anti-social behaviour
- To protect College and boarding premises and assets
- To assist in the investigation of incidents, complaints or allegations

CCTV is not used for routine surveillance, continuous observation of individuals, or staff performance management.

3. Legal Status and Compliance

This policy complies with:

- Education (Independent School Standards) Regulations (England)
 - Part 3 – Welfare, Health and Safety of Pupils
 - Part 4 – Suitability of Staff and Others
 - Part 8 – Quality of Leadership and Management
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Information Commissioner's Office (ICO) CCTV Code of Practice

4. Data Controller and Data Protection Oversight

David Game College is the Data Controller for all personal data processed through the CCTV system.

The College has appointed a Data Protection Officer (DPO) to oversee data protection compliance and provide advice regarding the use of CCTV.

Data Protection Officer:
Hussaina Choudhury

All data protection enquiries, including Subject Access Requests (SARs) relating to CCTV footage, should be directed to the Data Protection Officer via the College Office.

5. Lawful Basis for Processing

The College relies on the following lawful bases for processing personal data through CCTV:

- Article 6(1)(c) – Legal obligation (safeguarding and welfare duties)
- Article 6(1)(e) – Public task (education and protection of pupils)
- Article 6(1)(f) – Legitimate interests (security and safety)

Where CCTV footage relates to safeguarding matters involving children, processing may additionally rely on Article 9(2)(g) – substantial public interest.

CCTV use complies with the data protection principles of lawfulness, fairness, transparency, data minimisation, purpose limitation and security.

6. Location and Nature of CCTV Coverage

CCTV cameras are positioned in a proportionate and privacy-respectful manner and may cover:

- External entrances and exits
- Reception and access-controlled areas
- Corridors, stairwells and circulation areas
- Perimeter and communal areas
- Selected shared boarding and student spaces

CCTV cameras are not installed in areas where individuals have a reasonable expectation of privacy, including:

- Bedrooms
- Bathrooms
- Toilets
- Changing facilities

Record-Only / Incident-Review Areas

In some areas, such as boarding common rooms located within the main College building, CCTV cameras are installed for recording purposes only.

- These cameras are not actively or continuously monitored
- Footage is reviewed only if an incident, concern or allegation arises, including:
 - Bullying
 - Anti-social behaviour
 - Safeguarding concerns
 - Damage to property

This approach ensures safeguarding support while maintaining proportionality and respect for privacy.

The CCTV system does not record audio.

7. Monitoring Arrangements

The College operates a reactive monitoring model.

- CCTV footage is not continuously monitored
- Security staff have access to CCTV stations on the main system
- Footage is reviewed only when an issue arises or an incident is reported

Triggers for review may include:

- Safeguarding concerns

David Game College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential

- Allegations or complaints
- Behavioural or disciplinary incidents
- Health and safety incidents
- Requests from authorised agencies

8. Authorised Access to CCTV Footage

Access to CCTV footage is strictly limited to authorised personnel, including:

- The Principal
- The Designated Safeguarding Lead (DSL)
- Senior staff with security responsibility
- Authorised security staff acting under instruction

Access is granted on a need-to-know basis only. All access to footage is logged and auditable.

Authorised staff receive appropriate guidance on the lawful, proportionate and confidential use of CCTV footage.

9. Signage and Transparency

Clear and visible signage is displayed at College entrances and in relevant areas informing individuals that CCTV is in operation.

Further information is provided through the College's Privacy Notices, which explain how CCTV data is used, stored and protected.

10. Retention and Storage of Footage

- CCTV footage is retained for 28 days from the date of recording
- Footage is automatically deleted after this period

Footage may be retained beyond 28 days only where necessary, for example:

- Safeguarding investigations
- Disciplinary procedures
- Criminal investigations
- Insurance or legal claims

Any extended retention is documented with a clear rationale.

All footage is stored securely with appropriate technical and organisational safeguards.

11. Disclosure of CCTV Footage

CCTV footage may be disclosed where lawful and necessary to:

- Police or law enforcement agencies
- Local Authority Designated Officers (LADO)
- Safeguarding partners
- Legal advisers or insurers

All disclosures are:

- Proportionate
- Documented
- Made in compliance with data protection law

12. Subject Access Requests (SARs)

Individuals have the right to request access to CCTV footage in which they appear.

Requests must be made in writing and are processed in accordance with UK GDPR timescales and exemptions. Requests are managed in consultation with the Data Protection Officer.

The College may:

- Blur or redact third-party images
- Withhold footage where exemptions apply (e.g. safeguarding or crime prevention)

13. Safeguarding Use of CCTV

CCTV may be used to support safeguarding arrangements where appropriate, including reviewing incidents or allegations.

CCTV does not replace:

- Staff supervision
- Safeguarding procedures
- Professional judgement

14. Complaints

Any concerns or complaints regarding the use of CCTV should be raised with the Principal in the first instance.

Concerns relating specifically to data protection may also be raised with the Data Protection Officer.

Individuals retain the right to complain to the Information Commissioner's Office (ICO).

15. Monitoring and Review

The Principal has overall responsibility for the operation and oversight of the CCTV system.

This policy is reviewed annually, or sooner if required by:

- Changes in legislation
- Changes to the CCTV system
- Inspection or audit feedback

Any identified weaknesses will be addressed promptly.

16. Related Policies

This policy should be read alongside:

1. Safeguarding and Child Protection Policy
2. Data Protection Policy
3. Privacy Notices (Pupils, Parents and Staff)
4. Behaviour Policy
5. Health and Safety Policy

Review Details

Reviewed: September 2025

Next Review: September 2026

