



CCTV Policy 2026

## **Introduction**

This CCTV Policy explains how New Pastures uses closed-circuit television (CCTV) to promote a safe and secure environment for staff, students, individuals, visitors, and other persons whose images may be captured on our premises. The policy outlines how CCTV is managed, operated, and monitored in accordance with data protection legislation.

## **Legal Framework**

This policy has been drafted in accordance with:

- The General Data Protection Regulation (GDPR)
- The Data Protection Act 2018
- The Information Commissioner's Office (ICO) CCTV Code of Practice
- The Human Rights Act 1998

## **Policy Statement**

New Pastures operates CCTV throughout its premises to support security, safeguard individuals, and assist with the prevention and detection of crime. This policy applies to all individuals entering or working within the premises

## **Purpose of CCTV**

New Pastures uses CCTV for the following purposes:

- To provide a safe and secure environment for staff, students, individuals and visitors.
- To prevent the loss of or damage to New Pastures buildings and/or assets
- To assist in the prevention of crime and assist with law enforcement agencies in apprehending offenders.

## **Description of the System**

New Pastures uses fixed cameras throughout the provision. Cameras are not equipped for sound recording.

### **Siting of the cameras**

All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, students, individuals and visitors. Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. New Pastures will make reasonable efforts to ensure that areas outside of the premises are not recorded. Signs will be erected to inform individuals that they are in an area within which CCTV is in operation. Camera will not be sited in areas where individuals have a heightened expectation of privacy, such as changing areas or toilets.

### **Privacy impact assessment**

Prior to the installation of the CCTV system, a privacy impact assessment will be conducted by New Pastures to ensure that the proposed installation is compliant with legislation and ICO guidance. New Pastures will adopt a privacy by design approach when installing to avoid recording and storing excessive amounts of personal data.

### **Management and access**

The CCTV system will be managed and operated by Katie Wootton and Stuart Wootton, Directors of New Pastures. The viewing of live and recorded images will be restricted to members of staff with explicit powers to view images for the reasons set out above. No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy. The CCTV system is checked at least weekly by the directors to ensure that it is operating effectively.

### **Storage and retention of images**

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded. Recorded images are stored for a period of seven days unless there is a specific purpose for which they are retained for a longer period. New Pastures will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures at New Pastures include:

- CCTV systems is located in a restricted area
- The CCTV systems is encrypted and access is password protected
- Copies of data is restricted to the directors

- A log of any access to the CCTV images , including time and dates of access and record of the individual accessing the images will be maintained by New Pastures.

### **Disclosure of images to data subjects**

Any individual recorded in any CCTV image is a data subject for the purposes of the data protection legislation and has the right to request access to those images. Any individual who requests access to the images of themselves or of a person for whom they support (e.g vulnerable young people and adults) will be considered to have made a subject access request pursuant to the data protection legislation. Such request should be considered in the context of New Pastures subject access policy. When a request is made the directors will review the CCTV footage, in respect of the relevant time periods, in accordance with the request. If the footage contains only the individual making the request, then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The directors must take appropriate measures to ensure that the footage is restricted in this way. If the footage contains images of other individuals New Pastures must consider whether:

- The request requires the disclosure of images of individuals other than requested, e.g can the images be distorted so as not to identify others.
- The other individuals in the footage have consented to the disclosure of the images or their consent can be obtained.
- If not, then whether it is otherwise reasonable in the circumstances to disclose those images.

A record must be kept, and held securely, of all disclosures which sets out:

- When the request was made
- The process followed by the directors in determining whether the images contained third parties
- The considerations as to whether to allow access to those images
- The individuals that were permitted to view the images and when
- Whether a copy of the images was provided, and if so to whom, when and in what format

### **Disclosures of images to third parties**

New Pastures will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the data protection legislation. CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place. If a request is received from a law enforcement agency for disclosure of CCTV images the directors must follow the same process as above in relation to the subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they require the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed and the potential disclosure of any third party images. The information above must be recorded in relation to any disclosure.

This policy will be reviewed annually or sooner if legislation or operational requirements change.