

CCTV Policy

1 Policy Statement

1.1 Rainbow Corner Loseley Fields Ltd uses Close Circuit Television (“CCTV”) within some of the premises operated by the Business which includes and is not limited to Rainbow Corner Loseley Fields, Green Lane, Binscombe GU7 3TB. The purpose of this policy is to set out the position of the business as to the management, operation and use of the CCTV across the business.

1.2 This policy applies to all members of our workforce, children, visitors and all other persons whose images may be captured by the CCTV system.

1.3 This policy takes account of all applicable legislation and guidance, including:

1.3.1 General Data Protection Regulation (“GDPR”)

1.3.2 Data Protection Act 2018 (together the Data Protection Legislation)

1.3.3 CCTV Code of Practice produced by the Information Commissioner

1.3.4 Human Rights Act 1998

1.4 This policy sets out the position of Rainbow Corner Loseley Fields Ltd in relation to its use of CCTV.

2 Purpose of CCTV

2.1 TLC use CCTV for the following purposes:

2.1.1 To provide a safe and secure environment for children, employees and visitors

2.1.2 To prevent the loss of or damage to buildings, vehicles and/or other assets

2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

2.1.4 To safeguard children, staff, and visitors.

3 Description of systems

3.1 Some of our buildings have a number of cameras in and outside of the buildings. All cameras have sound recording capabilities and there is a range of movable and fixed cameras.

4 Siting of Cameras

4.1 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 employees, public and visitors.

4.2 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. Rainbow Corner Loseley Fields Ltd will make all reasonable efforts to ensure that areas outside of Rainbow Corner Loseley Fields premises and grounds are not recorded.

4.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation, both on buildings/entrance to depots and vehicles

4.4 Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.

4.5 Cameras may be located in meeting rooms and general office/working and, where this is the case, employees and public will be made aware. Access to the footage is restricted and will only be used to fulfil the purposes in 2.1.

5 Privacy Impact Assessment

5.1 Prior to the installation or repositioning of any CCTV camera, or system, a privacy impact assessment will be conducted by Rainbow Corner Loseley Fields Ltd to ensure that the proposed installation is compliant with legislation and ICO guidance. The assessment will be approved by the named Company Directors.

5.2 Rainbow Corner Loseley Fields Ltd will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

6 Management and Access

6.1 The CCTV system in all Rainbow Corner sites will be managed primarily by local site managers and overseen by a member of the SMT

6.3 On a day to day basis the CCTV system will be operated by an individual with appropriate technical ability. This may be a Business Manager or Site Manager/Supervisor depending on the structure on site.

6.4 The viewing of live CCTV images will be restricted to the Company Directors and others delegated by the Company Directors. In doing so they will ensure that the purposes in 2.1 are satisfied.

6.5 Recorded images which are stored by the CCTV system will be restricted as in 6.4. Relevant images may be shared following approval from the Company Directors with governing body panels reviewing exclusions, disciplinary matters or complaints.

6.6 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.

6.7 The CCTV systems should be checked daily to ensure that it is operating effectively

7 Storage and Retention of Images

7.1 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.

7.2 Recorded images are stored for a maximum of 60 days unless there is a specific purpose for which they are retained for a longer period.

7.3 Rainbow Corner Loseley Fields Ltd will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

7.3.1 CCTV recording systems being located in restricted access areas;

7.3.2 The CCTV system being encrypted/password protected;

7.3.3 Restriction of the ability to make copies to specified members of employees

7.4 A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by the local site manager

8 Disclosure of Images to Data Subjects

8.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images using the appropriate Rainbow Corner Loseley Fields Ltd 'subject access request' procedure

8.2 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of Rainbow Corner Loseley Fields Ltd Subject Access Request Policy.

8.3 When such a request is made the appropriate individual with access to the CCTV footage (ref 6.4) will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

8.4 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 individual accessing the footage must take appropriate measures to ensure that the footage is restricted in this way.

8.5 If the footage contains images of other individuals then the Company Directors must consider whether:

8.5.1 The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;

8.5.2 The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or

8.5.3 If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

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

8.6.1 When the request was made;

8.6.2 The process followed by to the individual with access to the CCTV footage in determining whether the images contained third parties;

8.6.3 The considerations as to whether to allow access to those images

8.6.4 The individuals that were permitted to view the images and when; and whether a copy of the images was provided, and if so to whom, when and in what format.

Note that, when a subject access request is made then, unless an exemption applies (such as in relation to third party data that it would be unreasonable to disclose) then the requester is entitled to a copy in a permanent form. There is reference here only to “access” as opposed to a “permanent copy” as Rainbow Corner Loseley Fields Ltd may consider it preferable in certain circumstances to seek to allow access to images by viewing in the first instance without providing copies of images. If an individual agrees to viewing the images only then a permanent copy does not need to be provided. However, if a permanent copy is requested then this should be provided unless to do so is not possible or would involve disproportionate effort.

9 Disclosure of Images to Third Parties

9.1 Rainbow Corner Loseley Fields Ltd will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

9.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

9.3 If a request is received from a law enforcement agency for disclosure of CCTV images then the individual with access to the CCTV footage must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable appropriate consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

9.4 The information above must be recorded in relation to any disclosure.

9.5 If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

10 Review of Policy and CCTV System

10.1 This policy will be reviewed every two years or earlier should the need arise.

11 Misuse of CCTV systems

11.1 The misuse of CCTV system could constitute a criminal offence.

11.2 Any member of employees who breaches this policy may be subject to disciplinary action.

12 Complaints relating to this policy

12.1 Any complaints relating to this policy or to the CCTV system operated by Rainbow Corner Loseley Fields Ltd should be made in accordance with the appropriate Company Complaints Policy.

This policy was reviewed on: 16th September 2025

By: Lucy Whitehead (Managing Director)