

## **Cotham School Playing Fields Stoke Lodge**

### **Updated statement - Dated 01/03/2019**

We are delighted to announce that there will be students back playing sport at Stoke Lodge this half term. The fence will be completed early next week, the pitches will be marked out and the sports posts put in place. We have made temporary arrangements for health and wellbeing facilities. We will not have any changing rooms on site.

In preparation for school use we now ask that members of the public desist from taking dogs onto our playing fields. There is now a circular walk around the edge of our fields which we hope members of the public out with their dogs will use. The walkway will be available to all during school hours be they dog walkers, joggers or people on their way to the shops, bus stops or school. We thank you for your cooperation.

Members of the public will still be able to use our playing fields when not in use by the school, local sports clubs, or the University.

Please find below new FAQs from number 23. In these new FAQs we are hoping to answer questions that keep coming up and to ensure everyone understands the facts.

These questions have been put together to provide information concerning the future use of Stoke Lodge Playing Fields. This is not intended to be a definitive list, nor a legal document, but rather a place to share information. We hope you will find this helpful. We will add to these as our projects develop further.

Our sincere thanks for your ongoing support and tireless campaigning on behalf of the school

### **Update 16/01/20**

**FAQ 39 has been added to provide clarity about the use of CCTV over a school holiday period**

### **Update 07/01/20**

FAQ 32 has been amended to reflect current status. FAQ 33-38 have been added to provide clarity about TPO trees on site and recent clearance of Elder.

### **Update 12/11/19**

FAQ 31 and 32 have been added FAQ 15,19, and 24 have been amended in order to provide further clarity.

### **Update 14/03/19**

FAQ 30 has been added and FAQ 1,2,4,11,17,22 and 26 have been amended in order to provide further clarity.

## Frequently Asked Questions (FAQs)

1. **Question: When do Cotham School expect to be back using Stoke Lodge Playing Fields?**

**Answer:** Once the fencing is completed, the grass cut, the pitches marked and the posts up we will resume PE lessons at Stoke Lodge. We hope this will be soon after half term, projected target date is from 25 February 2019. ***The school returned to using the site for PE lessons on 11-03-19***

2. **Question: When will Cotham School be using the playing fields and when will the community be able to get access to the fields?**

**Answer:** School will use the site most days in term time, occasionally at weekends and, of course, barely at all in the school holidays. (Though there could, for example, be holiday schemes in the future.). We will lock the gates at dusk and we will open them for school or club/community use the next day. We have received several approaches from organisations keen to share our playing fields. We will need to carefully manage the use to make sure the pitches remain in good playable condition. ***Any team or organised group use (formal or informal) must be authorised by Cotham School in order for the school to be able to appropriately manage the site and its pitches/playing surfaces.***

3. **Question: : How much has the fence cost? And how has it been funded?**

**Answer:** All costs including the professional fees associated with the playing fields project have been funded through the Condition Improvement Fund. This is provided by the Department for Education. The funding was awarded using a number of factors, the primary one being safeguarding. The funding has already been paid to the school for the fence and there are only two phased payments of the total grant left to be paid. These are progress payments linked to the pavilion element of the project. The tendered cost of the installation of the fence is going to be significantly less than the original forecasted costs of £150,000, this is due to the use of value for money principles, including robust project management principles. The fencing costs are projected to be no higher than £65,000.

4. **Question: Can I walk my dog on the fenced area of the playing fields?**

**Answer:** No. As with other school playing fields across the UK, dogs are not allowed on the playing fields area inside the fence at any time apart from 'service dogs'. The perimeter part of the playing fields outside of the fence will be accessible to the public including dogs twenty four hours a day. ***For clarity 'service dogs' must be registered as such and performing duties. The playing field area is not to be used for training or general exercise of service dogs.***

5. **Question: I understand you are planning to set up a user group. Who will be invited to this?**

**Answer:** We propose to invite the local sports clubs, University, local Primary schools, Stoke Lodge Adult Education Centre and representatives of the local community who have expressed an interest in sharing the use of our playing fields. This will be an 'invite only' group.

6. **Question: Do you know that there are badgers on the site?**

**Answer:** We have had a full ecological study of the site and at that time, last summer, there was no evidence of an active badger sett on site. This study would normally be valid for around two years, however in the light of local concerns we have revised this. Renewed specialist advice indicates that there is an outlying sett in the south west corner of the site. However, there is no evidence that the sett, when inspected, was occupied.

7. **Question: Have you been in touch with Stoke Lodge Adult Education Centre?**

**Answer:** Yes. We have met with the Manager of the centre and talked about the future opportunities for classes to share the use of our fields and, of course, to use the perimeter walkway and the wildlife areas around the playing fields.

8. **Question: We understand there have been some complicated planning and landlord issues to work through with the Council, are these now resolved?**

**Answer:** Yes. We have worked closely with the City Council to work through the planning, listed building, landscape and landlord issues. Legal opinion confirmed that the playing fields are not within the curtilage of Stoke Lodge House which is a Grade 2 Listed Building. All matters were clarified late last year - no approvals are required for the planned fence.

9. **Question: What are your plans with regard to the sports pavilion?**

**Answer:** We were very disappointed that the City Council refused to grant planning permission for our replacement pavilion. We have now submitted an appeal to the Planning Inspectorate which we expect to be dealt with by written representations. This application has been registered but an inspector has not yet been allocated to the case. The replacement pavilion was supported by Sport England who acknowledged that the school needs new facilities and that these would be expected to be shared for local club use including the ability to make light refreshments and thus raise club funds. There is no bar included in the plans. We have a grant from the Department for Education through the Condition Improvement Fund for the pavilion.

10. **Question: What Welfare facilities will be on site until the pavilion is ready?**

**Answer:** Students will have access to toilets, first aid facilities and secure space for personal possessions at the playing fields. These will be available from the first day that students return to the playing fields. Students will continue to use the changing

facilities at school until the pavilion is rebuilt so will arrive at the playing fields ready to start their lessons.

**11. Question: What are you doing with regard to signs on the site?**

**Answer:** We have two signs that do not require planning approval and, a third one was regrettably refused planning approval by the City Council. We are considering what signs we need and where they will be located. We have not yet decided if we will appeal the planning refusal. ***There will be signs saying 'no dogs beyond this point' on all pedestrian entrances to the fenced area, there are also signs saying 'do not climb' mounted at 60m intervals on both sides of the fence to discourage climbing of the fence.***

**12. Question: How will you know the site is being used properly?**

**Answer:** we have installed some CCTV cameras on the site. However, we are placing great trust in people to use the site properly and to respect school property. In the unfortunate event of any vandalism or inappropriate behaviours we will take necessary action.

**13. Question: Are you aware of the Tree Preservation Order (TPO) affecting the site?**

**Answer:** Yes this is a group TPO with some separately identified trees. It is the City Council's responsibility to maintain these trees and undertake any works to them. In planning our fence and pavilion we have undertaken further tree surveys and prepared an 'Arboricultural Method Statement' to ensure that there is no damage to the trees. We have retained a consultant arboriculturalist and have continued to work with City Council officers. Cotham has worked with the City Council from the project planning stage last autumn. At this time the School submitted all technical documents to the City Council including the plan of the site, the Arboricultural Method Statement and the Ecology Report. We continued this sharing of information through to the start of the installation phase of the fence and will continue to do so through to the completion of the fence project and the building of the replacement pavilion. All of our plans, documentation and the processes we have followed have been to the City Council's satisfaction throughout.

**14. Question: Is Cotham School interested in biodiversity?**

**Answer:** Yes we are keen to run as sustainable and environmentally responsible a site as possible. We will be developing projects around waste management, sustainable travel, encouraging more birds and wildlife through bird boxes and log stores, and increasing biodiversity by enabling some parts of the site and perimeter area to become more informal wildlife areas. We would like to work with both students and local interest groups on this.

**15. Question: What is the University's role at Stoke Lodge?**

**Answer:** As a result of the original contract the University has maintained the playing fields in return for a fee and the use of income generated from letting the playing fields. Once Cotham are ready to go back on site this contract will be reviewed. The University has been an extremely helpful partner to Cotham School and the successful operation of

the playing fields. **Since writing this FAQ University of Bristol have no formal involvement with the management or maintenance of Stoke Lodge. The contract between the school and UoB ended on 31 July 2019**

**16. Question: Is it true the University have an interest in the lease of Stoke Lodge?**

**Answer:** No. Cotham School agreed a 125 year lease of the playing fields with Bristol City Council when the school became an Academy in 2011. This is a one way reversionary lease in favour of Cotham School. The lease was granted and agreed on the basis that the site is available for use as 'school playing fields' and has to be returned to Bristol City Council as 'school playing fields' at the end of the lease.

**17. Question: What does the reference to 'community use' in your lease mean?**

**Answer:** The reference to community use means that Cotham can share its facilities with the wider community. On our main site we lease space to community organisations such as the Saturday morning Arabic School and local sports clubs. This is planned and booked use. At Stoke Lodge we expect local sports clubs to book the use of the playing fields and the use of the pavilion, for which there will be a fee. At Stoke Lodge we have also said that when the school and other organisations are not using the playing fields then they will be open for informal/recreational public use. This informal use will be allowed on trust and will absolutely not allow any dogs onto the land within the fence as is common practice for school playing fields. *Public use is permitted for individual/family type recreational use and is subject to conditions of use. Organised groups or team use must be expressly approved by the school (see FAQ 2 for reasons and FAQ 30 for conditions of use)*

**18. Question: Will other local schools be able to use the Playing fields?**

**Answer:** We are clear that Stoke Bishop Primary School will have the same access to the playing fields for educational use that it has always done. We envisage that Primary Schools and in some cases other Secondary Schools may also like to make use of the Fields and may do so at the same time as Cotham students are using them. Also that the other members of the NW24 schools group, of which Cotham is a member and Cotham's many feeder schools may also wish to use the facilities from time to time.

**19. Question: Will it still be possible to walk round the site?**

**Answer:** Yes, it will still be possible to walk round the playing fields, there will be a walkway connecting the main access points to the play area, to Stoke Lodge House and to the local bus stops. Some of this route is school land that the public will be able to use at all times at their own risk. The public will also be able to walk their dogs around the site using this route. **Since writing this FAQ members of the public have cleared a path behind Stoke Lodge house. This path was created without the knowledge or permission of the school or Bristol City Council. As such Cotham School does not maintain this particular path.**

**20. Question: Are you aware that there are three Rights of Way applications on routes that go across the School Playing Fields?**

**Answer:** Yes we are and we will make the appropriate representations at the point that the City Council considers these applications.

21. **Question: Is it true that another Town and Village Green application has been submitted for this site?**

**Answer:** Yes, a new TVG application has been submitted, and accepted as duly made by the City Council. As before the School will now follow due process to seek to ensure this TVG is not allowed. At the present time we are awaiting an indicative timetable within which we will lodge our objections. We deeply regret this further challenge and the inevitable diversion of funds this is going to require, but we are committed to protecting our playing fields for future generations. As before we hope to work with the City Council as landowner, the University, local sports clubs and local interested people to ensure this application is not successful.

22. **Question: What risk assessments are in place for offsite P.E lessons?**

**Answer:** The school has two risk assessments, one for Coombe Dingle Sports Complex (which the school currently uses for P.E) and one for Stoke Lodge Playing Fields. There is one for each site as the environments are very different and so are the control methods needed to reduce and eliminate the hazards that exist. The risk assessments have been reviewed for this academic year and assessed by an appropriately qualified and very experienced Health and Safety Consultant. The school obtains health and safety advice and guidance from highly qualified, knowledgeable, professionals who are experienced in education requirements and laws, health and safety laws; who also have local knowledge of Bristol and its education requirements. These services are procured through Delegated Services. ***A Risk assessment (RA) of Stoke Lodge was carried out in 2018 prior to the installation of fence and was reviewed in 2019 subsequent to installation of fence. The RA will be reviewed in September 2019 along with annual the RA review for the rest of the school. As part of the review in 2019 RoSPA have also provided an assessment of our site, the school wished to be sure that the fence installation would not provide additional risk to users of the site, these are the points of note from their report:***

- ***Fence:*** *The playing fields are suitably fenced to control the risks presented to users. Risk level LOW (there is deliberate damage identified which is known to require minor repair).*
- ***Grass:*** *The football pitch and the two marked out 60x40 grids are in an acceptable condition. Other pitches and tracks for individual sports have not been assessed as they are either not yet marked out or are subject to reinstatement. Risk level LOW*
- ***Football Goals:*** *[Standards; EN 748:2013, BS 8461:2005+A1:2009] The item and its surfacing (where applicable) meet with the requirements of the relevant standards. Risk level LOW*

- **Pavilion:** The building has been condemned and is fenced off pending further action. It has not been inspected inside the fence. Reinstatement should take place to remove the risks associated with security fencing, dilapidated buildings and unauthorised access. Risk level VERY LOW \*School RA is HIGH IF this building is used (**DO NOT USE**).
- **Badgers:** There are badger scrapes under the fence in places. Monitor to ensure they do not become tripping hazards for users. Risk level VERY LOW
- **External Perimeter:** Risk level LOW, no remedial tasks required.

**The school assessment of the site before the fence showed the hazards identified and calculated risks as:**

- **Dog faeces** (possible health issues) – Medium Risk
- **Dog attack** (causing potential serious injury) – High Risk
- **Violence and aggression from trespassers** – Medium Risk
- **Exposure to drugs and paraphernalia** – High Risk
- **Vehicles/motorcycles on the playing field area of the site** – High Risk
- **Travellers** – Medium Risk (Operational)
- **Antisocial Behaviour** – Medium Risk (Operational)
- **Drones or Model Aircraft** – Low Risk
- **Rubbish Dumping** – Low Risk (Operational)
- **Unauthorised Events** – Medium Risk (Operational)
- **Students Absconding from site** – Medium Risk (Safeguarding management)

Clearly there were a number of issues that made the site unusable (HIGH risk).

**Following the installation of the fence the assessment of the site has been reviewed to encompass changes, more than half of the risks (6 out of 11) are now rated as lower or less likely to occur and have reduced accordingly, most important is that there are no HIGH risks remaining\*:**

- **Dog faeces** (causing possible health issues) – Low Risk
- **Dog attack** (causing potential serious injury) – Medium Risk\*\*
- **Violence and aggression from trespassers** – Low Risk
- **Exposure to drugs and paraphernalia** – High Risk\*
- **Vehicles/motorcycles on the playing field area of the site** – Medium Risk\*\*
- **Travellers** – Low Risk (Operational)
- **Antisocial Behaviour** – Medium Risk (Operational)\*\*\*
- **Drones or Model Aircraft** – Low Risk

- **Rubbish Dumping** – Low Risk (Operational)
- **Unauthorised Events** – Medium Risk (Operational)
- **Students Absconding from site** – Low Risk (Safeguarding management)

*\*The high risk here is around the derelict pavilion building. Until the building is rebuilt this risk remains and the building cannot and will not be used by the school, meaning that while the existing control measures remain in place using the fields themselves is low risk, this is supported by the RoSPA assessment of this part of the site.*

*\*\*Risks of physical harm that remain Medium (Dog Attack and Vehicles on Site) are controlled as well as they can be, they are Medium because of the potential for harm from these risks. Likelihood of either of these occurring is LOW while control measures remain in place.*

*\*\*\*Antisocial Behaviour remains a medium risk due to the currently high likelihood of occurrence. The school will deal with issues of behaviour in conjunction with police and the safeguarding team. Issues like members of the public using binoculars or taking photographs on site are included in this consideration. The school does have options with regard to managing this element of antisocial behaviour, however now that the site is being used the school hopes this kind of behaviour will not reoccur. Risk here is operational risk.*

*Welfare facilities on site are provided in the existing mower shed building at Parrys Lane end of site. Facilities are unisex (full cubicle) toilets, hot and cold water and staff rest room.*

*Partial CCTV has been installed and will be extended over time; investigations into antenna to extend radio range are in hand.*

### 23. **Question: Has the user group been set up yet?**

**Answer:** We have invited members of We Love Stoke Lodge and other people from the local community to a first meeting of the community user group. This is now in the diary. We are planning a separate meeting for sports clubs who will be using our pitches

### 24. **Question: Relationship with the University**

**Answer:** Much has been made of Cotham School having a close relationship with the University, it is time for people to understand that the University does not have an interest in the land at Stoke Lodge. Cotham School has had a long established contract with the University for the Grounds Maintenance and management of lettings at Stoke Lodge. The school also rent space at the University's Coombe Dingle sports site. These contracts will be reviewed once the use of Stoke Lodge has been re-established. Cotham School was delighted that the University worked with the School to defend the first application for a TVG on the school playing fields and that we have been able to use Coombe Dingle Sports Complex in the interim. **Since writing this FAQ University of Bristol have no formal involvement with the management or maintenance of Stoke Lodge. The contract between the school and UoB ended on 31 July 2019**

### 25. **Question : How often will Cotham School use Stoke Lodge?**

**Answer:** It is anticipated that the area within the fence will be used by the school every day in term time, and be available for community use at the end of the school day, until dusk when the gates will be closed. The area outside of the fence that is still part of Cotham School will be available to the community at all times.

**26. Question: Will people be treated as trespassers?**

**Answer:** Yes, if people go onto the school playing fields when they are being used by the school or when the gates are locked and the playing fields are unavailable then those people will be treated as trespassers and will be asked to leave immediately. The playing fields are classed as private land which form part of the school site. Section 547 of the Education Act 1996 applies to Stoke Lodge playing fields and any person without lawful authority to be present on the premises (including playing fields) is guilty of an offence and liable on summary conviction to a fine. Persons including a Police Officer who have been authorised to exercise the powers of section 547 and has reasonable cause to suspect that any person is committing or has committed an offence under this section may remove the person from the site. The section 547 Officers for the school are currently the Headteacher, Business Manager and Facilities Manager. The school has the right to add other roles to the list of Section 547 Officers as required. ***Any users (including groups or teams, formal or informal) that are using the site not in accordance with terms or conditions of use can/will be requested to leave the site at any time in accordance with the above. See FAQ 30 for conditions of use.***

**27. Question: Will there need to be more signs around the site?**

**Answer:** Yes, there will need to be quite a few more signs on and around the playing fields, these are required to remind members of the public that these are private playing fields, and that members of the public should respect the rules when using them and whether using the playing fields or the perimeter walkway that members of the public do this at their own risk. These signs will be of such a size as to not require planning advertisement approval.

**28. Question: Is it true that there has been a lot of vandalism at Stoke Lodge Playing fields?**

**Answer:** Yes, there has been a great deal of vandalism including graffiti on the pavilion and groundsman hut, uplifting and defacing of signs, damage to the new fence and vehicles driving on the playing fields. We would be grateful if members of the public could desist from these acts of vandalism. Clearly Cotham School cannot condone criminal activities; all these acts of vandalism have been reported to the police and we have now put in place additional security measures. The financial cost to the school has been considerable and has caused money set aside for the running of the school to repair the damage. If you see any suspicious behaviour please report it to the school.

**29. Question: What is Cotham Academy?**

**Answer:** Cotham School became an Academy in 2011. We are set up as a co-operative academy. In becoming an Academy, we adopted a set of values in line with the co-operative movement. We have a Board of Governors who give their time and skills freely

and without any financial or other reward, other than that they know they are playing a key role in governing our school. We are a Private Company Limited by guarantee with no shareholders. Our funding comes directly from the Education Skills Funding Agency. We maintain a strategic relationship with Bristol City Council, to ensure secondary school places for Bristol children and to buy back some essential services from the Council. We do not have any private sector investment or sponsorship. Cotham School is not part of a larger multi-academy trust.

30. Question: **Are there specific conditions of use for the playing field?** Answer: Yes, conditions of use for individuals on the playing field are:

- *Do not cause nuisance or disturbance to the School or authorised users of the field at any time*
- *Do not undertake any activity on playing surfaces or pitches which may harm the area for use by legitimate or authorised users*
- *Leave the playing fields if requested to do so by representatives of the school or authorised users of the playing field*
- *Dogs and other animals are not allowed within the fenced playing field area at any time, this is in accordance with the Bristol City Council Dog Protection Order October 2017.*
- *No vehicles allowed*
- *No golf*
- *No model aircraft or drones*
- *No Alcohol*
- *No Smoking*
- *Litter and other items you have brought must be removed when you leave the site*

*The above conditions of use apply to individual/family use of the playing field. **N.B. All group or team activity, or specific use of marked pitches for organised sports must be expressly authorised by the school and comply with standard terms of use for school facilities.***

31. Question: **Is there any specific guidance that says school sites should be fenced?** Answer: Yes, draft guidance published by on gov.uk in November 2018 indicated that site perimeters should be secured potentially using fences. Following consultation on the draft guidance the final published guidance reads:

#### *1.1 Perimeter*

*The boundary is the first line of defence and should be protected with a secure fence or railings such as Weldmesh fencing to BS1722 or expanded metal or railings over 2.0m high.*

More info regarding published guidance to schools can be found at

<https://www.gov.uk/government/publications/school-and-college-security/site-security-guidance?fbclid=IwAR0SEaHdQ7X1Cd4pWw0joYB5hp0Ah4B59jiZumdb41cUvdNZHZ1UtiA37E>

32. **Question: *Why is the playing field not currently being unlocked?***

**Answer:** The gates are currently being unlocked on a daily basis and all weekend. Unfortunately a number of dog walkers were observed inside the fence over the Christmas period. If dog walkers continue to be observed within the fenced area the school may have no choice other than to lock the gates to prevent access.

33. **Question: *Are there any TPO trees at Stoke Lodge?***

**Answer:** Yes there are a number of trees protected by TPO at Stoke Lodge. Trees within the school leased land are registered on TPO 1192.

34. **Question: *What types of TPO are there on trees at Stoke Lodge?***

**Answer:** There are 4 types of TPO:

1. Individual TPO. Number at Stoke Lodge on School leased land is 17
2. Group TPO. Number at Stoke Lodge on School leased land is 10  
\*note any tree in a group TPO is also specified by species
3. Woodland TPO. Number at Stoke Lodge on School leased land is 0
4. Area TPO. Number at Stoke Lodge on School leased land is 0

please see <https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#tree-preservation-orders--general> for further info about TPOs including relevant uses of the various types

35. **Question: *Are the recently felled Elder covered by a canopy TPO?***

**Answer:** In short; no. There are 4 types of TPO (see 34), 'canopy' TPO is not one of the types of TPO. The Elder is under the canopy of T14 of TPO 1192. T14 is an individually protected Sycamore tree. The individual protection of T14 does not provide any protection to any other trees near to it. Whilst there are group TPOs on site; the felled Elder are not within one of the group protection areas. It should also be noted that 'Elder' as a protected species does not appear anywhere on TPO 1192 which covers the school playing fields at Stoke Lodge

36. **Question: *Did BCC permit the felling of the Elder?***

**Answer:** Yes, permission to carry out this maintenance was sought and received from BCC as the school's landlord.

37. **Question: *Did the school receive planning permission to fell the Elder?***

**Answer:** No, planning permission was not required as the Elder is not protected by any form of TPO. *TPO 1192 map has been attached to the end of this document for clarity*

38. **Question: *There are circular pieces of plastic in the Elder Stumps, what are they?***

**Answer:** These are EcoPlugs. They are a targeted herbicide treatment that a tree surgeon inserts into the cut stump to prevent regrowth. Experts consider use of EcoPlugs the safest and most sensitive method of treating a stump. Traditional methods to prevent regrowth include direct application of herbicide, which carries a risk to both the operator and the area around the target due to the uncontained application of chemicals and/or overspray. EcoPlugs are safe to use for operators, and around children and animals due to the encapsulated design of the product.

39. **Question: Why does the school use CCTV on the site at Stoke Lodge and does it record all the time?**

- 1) The cameras that have been installed are recording footage twenty-four hours a day, seven days a week to maintain the security of our site, this is perfectly normal for a school site, we also have CCTV on our main school site at Cotham lawn Road. It also provides reassurance during the day when lessons are taking place and in addition to organisations such as our insurers. We will be able to investigate incidents that occur during or outside of the school day. We will be able to provide evidence to our insurers and the police should incidents occur that we need to report to either of these organisations.

The CCTV also enables us to see any hazards before the students undertake their daily lessons that we would need to manage to ensure that our students and staff will be safe whilst on the fields.

2) **Have any incidents occurred since CCTV was installed that you have needed to view the footage for?**

It was reported to us that dogs had been seen inside the fence over the holiday period. We investigated if this information was accurate.

We have risk assessed the school site at Stoke Lodge and have installed a fence to control the hazards identified in the assessment.

One of the identified hazards is the exposure to 'dog faeces' and the health risks this presents to our students, staff and local sports groups who have an agreement with the school to use the site. Therefore the permission given by the school to members of the public specifically makes it clear through signage that dogs are not permitted inside the fence. If an incident is reported to us that dogs have been seen inside the fence, then we will want to verify this to assess if there is a risk to students, staff and local sports clubs from dog faeces. This will inform whether we need to dispatch staff to undertake a 'clean up' exercise before students return to using the site. The most efficient method of assessment for us is to use the CCTV footage to undertake this assessment, this is what has happened as part of our investigation.

3) **Reference Lawful basis for Use, how does it fulfil article 6 and/or 9 of the GDPR or DPA 2018 Schedule 1, Part 2, Para 6, 10 or 18?**

In relation to the recent incident that we investigated, no breach of the data protection act has taken place as we have chosen to report this generally through our social media site and have not made any identifying reference to the adults walking their dogs on the school site. In addition to this, we have no intention of trying to undertake any form of identification of these adults, the footage was used to assess whether any form of clean up was needed before staff and students returned to the school site for their P E lessons. If this had been an isolated incident, we would not have needed to publish the details but out of a duty of care to those using the site, we wish to make it clear that dogs are not permitted inside the fence at any time. It may well be that the adults exercising their dogs on the site inside the fence had failed to notice the signs making it clear that dogs are not permitted. This is a further attempt to make that completely clear to those that wish to use the school site at Stoke Lodge, that permission is given by the school but will be withdrawn if there is a continuation of dogs being exercised within the fence.

We intend to use CCTV in this way for all future incidents and occurrences to ensure that we comply with the Data Protection Act at all times.

4) **Which part of Under 5.8 of your DPIA does the lawful basis for this CCTV use fall?**

No images or data from the CCTV has been shared in relation to the incident involving dogs inside the fenced area of the playing fields. We do not intend to share images publicly. Our intention would be that images will only be shared with organisations that we may need assistance from in the event of any incident or occurrence. This would most likely be (but not limited to), our insurers, the police, our health and safety advisors, etc. therefore this is not relevant to the current situation or our general management of the school site at Stoke Lodge.