



## CCTV Policy

### 1. Policy Statement

The following policy has been written in order to satisfy Wakefield Grammar School Foundation's (the "Foundation") statutory obligations as identified within the General Data Protection Regulation, the Data Protection Act 2018 and the Education (Independent School Standards) Regulations 2014. It also meets the standards identified within the Regulation of Investigatory Powers Act 2000 and the Protection of Freedoms Act 2012.

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System within all properties controlled by the Foundation. It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the Foundation and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the System).

The System is administered and managed by the Foundation, who act as the Data Controller. This policy will be subject to review from time to time, and should be read with reference to the Foundation's Data Protection Policy and Privacy Notices. For further guidance, please review the Information Commissioner's CCTV Code of Practice.

All fixed cameras are in plain sight on the Foundation premises. The Foundation does not routinely use CCTV for covert monitoring or monitoring of private property outside the School grounds.

The Foundation's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the Foundation believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

### 2. Objectives of the System

- 2.1 To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 2.2 To protect the Foundation's buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- 2.3 To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- 2.4 To monitor the security and integrity of the Foundation's site and deliveries and arrivals.
- 2.5 To monitor staff and contractors when carrying out work duties if required and where necessary to review recordings of their activities where breaches of discipline may be suspected as part of a wider disciplinary or grievance investigation and where it is reasonably considered that CCTV images may assist with such investigation or are in the legitimate business interest.

- 2.6 It is not an objective to routinely monitor discipline among pupils but the System may be used to assist an investigation into a pupil disciplinary matter in line with the Behaviour and Discipline Policy, which is available to parents and pupils on request.

### **3. Positioning**

- 3.1 Locations have been selected, both inside and out, that the Foundation reasonably believes require monitoring to address the stated objectives.
- 3.2 Adequate signage has been placed in prominent positions to inform pupils, staff, volunteers, visitors and members of the public that they are entering a monitored area, identifying the Foundation as the Data Controller and giving contact details for further information regarding the system. See Appendix A for the location of these.
- 3.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- 3.4 No images of public spaces will be captured except to a limited extent at site entrances.

### **4. Maintenance and Supervision of the System**

- 4.1 The CCTV System will be operational 24 hours a day, every day of the year.
- 4.2 The day-to-day management of images will be the responsibility of the Estates Manager who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.
- 4.3 The System Manager is trained in operating, recording and retaining images taken, as well as the procedure for disclosure.
- 4.4 The System Manager will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
- 4.5 The System will be checked and (to the extent necessary) serviced no less than annually.

### **5. Operation of the System**

- 5.1 Estates staff and Administrative staff in the Senior School Offices will review live images during the day.
- 5.2 Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

### **6. Storage of Data**

- 6.1 Images will be stored for 28 days, and automatically over-written unless the Foundation considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.
- 6.2 Where such data is retained, it will be retained in accordance with the GDPR, Data Protection Act 2018 and our Data Storage, Retention and Disposal Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded in the system log book.
- 6.3 The log book is retained securely in the Estates Office with restricted access.

### **7. Access to Images**

- 7.1 Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
- 7.2 Individuals also have the right to access personal data the Foundation holds on them (please see the Privacy Notices), including information held on the System, if it has been kept. The Foundation will require specific details including at least in respect of date, time and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.
- 7.3 The System Manager must satisfy themselves of the identity of any person wishing to view stored images and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV images:
  - 7.3.1 Where requested to do so by the Bursar, the Head, the Police or a relevant statutory authority;
  - 7.3.2 To make a report regarding suspected criminal behaviour;
  - 7.3.3 To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
  - 7.3.4 To assist the Foundation in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian will be informed as part of the Foundation's management of a particular incident;
  - 7.3.5 To determine if an accident has happened;
  - 7.3.6 To enable the Investigating Manager and/or HR Manager to assist with investigations including disciplinary or grievance;
  - 7.3.7 To assist the ICT Security Manager and/or the ICT Technical Director in the event of a system failure;
  - 7.3.8 To data subjects (or their legal representatives) pursuant to a Subject Access Request under the Act and on the basis set out in 7.2 above;
  - 7.3.9 To the Foundation's insurance company where required in order to pursue a claim for damage done to insured property; or
  - 7.3.10 In any other circumstances required under law or regulation.
- 7.4 Where images are disclosed under 7.3 above a record will be made in the system log book including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).
- 7.5 Where images are provided to third parties under 7.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

## **8. Other CCTV systems**

- 8.1 The Foundation does not own or manage third party CCTV systems, but may be provided by third parties with images of incidents where this is in line with the objectives of the Foundation's own CCTV policy.
- 8.2 Some pupils may travel to School on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The Foundation may use these in establishing facts in cases of unacceptable pupil behaviour, in which case the parents/guardian will be informed as part of the Foundation's management of a particular incident.

## 9. Complaints and Queries

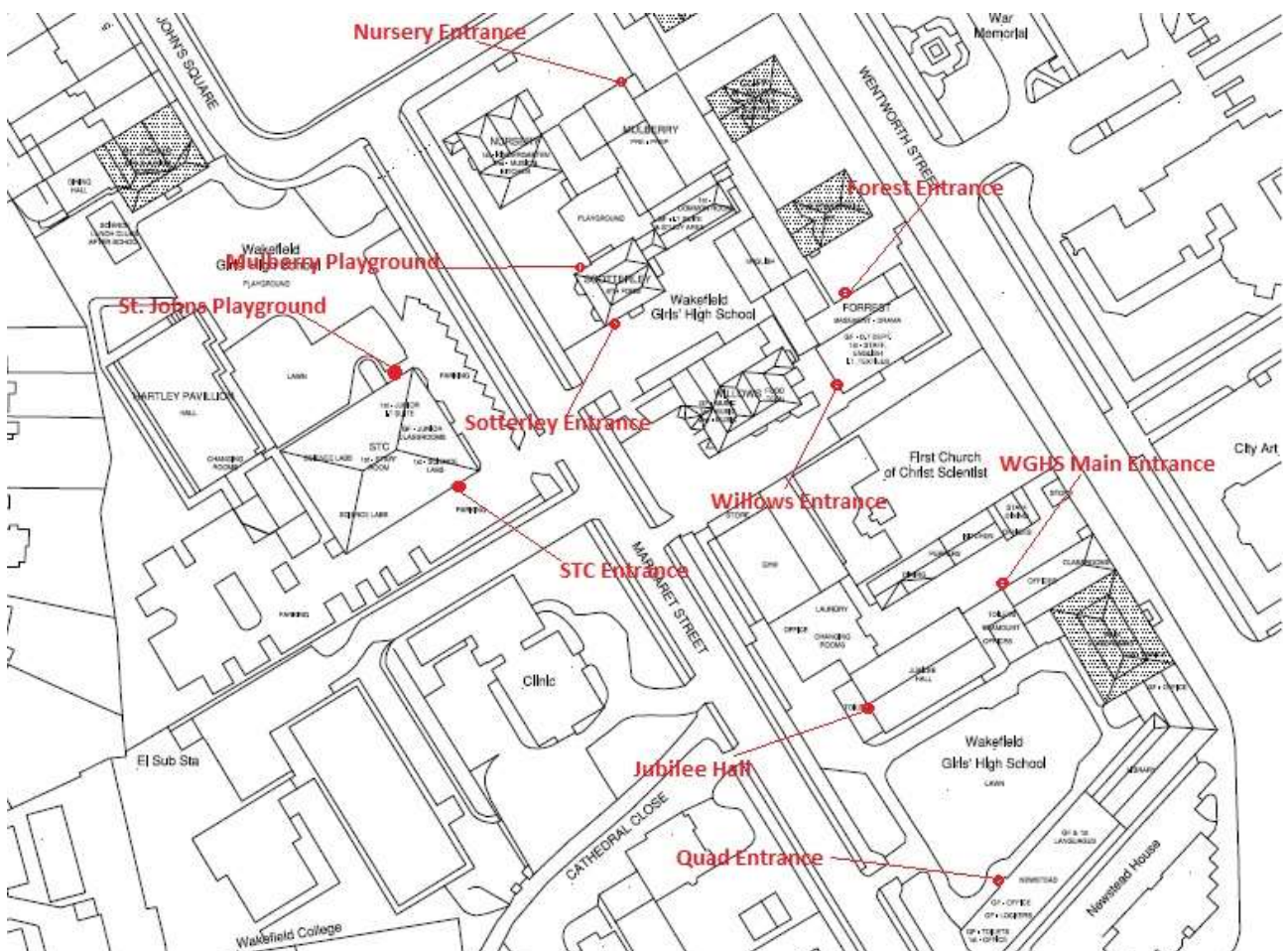
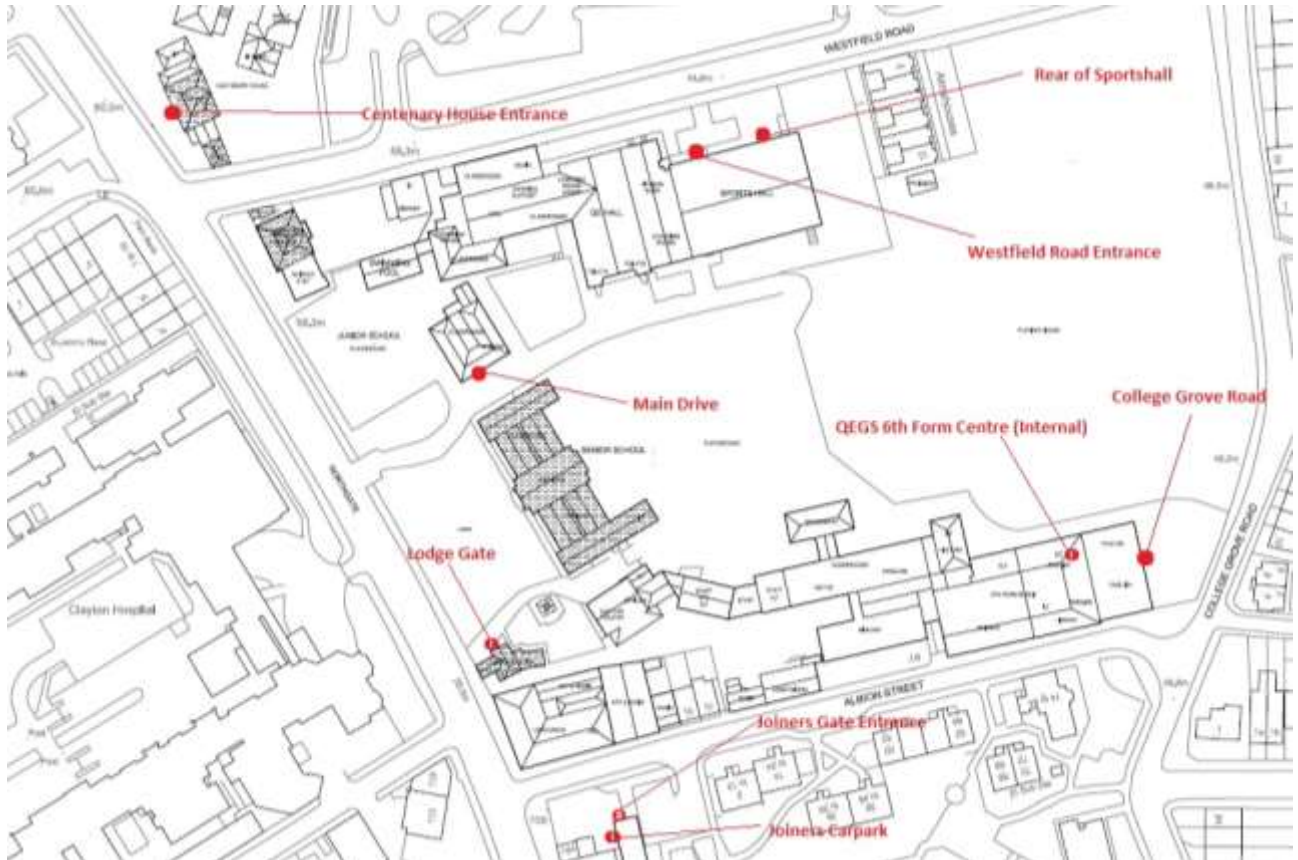
Any complaints or queries in relation to the Foundation's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Systems Manager.

This policy should be read in conjunction with the Foundation's Privacy Notice and Data Protection Policy.

### Review History

Policy written	April 2018	D Cowderoy
Updated	July 2018	S Williams-McGlone/D Cowderoy
Updated	March 2019	S Williams-McGlone/D Cowderoy/A Casey

## Appendix A – Locations of CCTV Signage



## Appendix B CCTV FOOTAGE ACCESS REQUEST

The following information is required before the Foundation can provide copies of or access to CCTV footage from which a person believes they may be identified.

Please note that CCTV footage may contain the information of others that needs to be protected, and that the Foundation typically deletes CCTV recordings after 28 day period.

Name and address:  (proof of ID will be required)	
Description of footage (including a description of yourself, clothing, activity etc.)	
Location of camera	
Date of footage sought	
Approximate time (give a range if necessary)	

Signature\* .....

Print Name.....

Date .....

**\* NB if requesting CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 or over, the child's authority or consent must be obtained except in circumstances where that would clearly be inappropriate and the lawful reasons to provide to the parent(s) outweigh the privacy considerations of the child.**